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FINAL
MOUNTAIN VALLEY
GRAZING MANAGEMENT
ENVIRONMENTAL IMPACT STATEMENT
UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT



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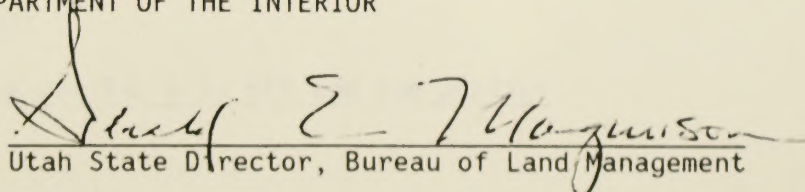
ENVIRONMENTAL IMPACT STATEMENT

MOUNTAIN VALLEY

GRAZING MANAGEMENT

Prepared by

BUREAU OF LAND MANAGEMENT
DEPARTMENT OF THE INTERIOR


Utah State Director, Bureau of Land Management

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MOUNTAIN VALLEY PROPOSED GRAZING MANAGEMENT

Draft () Final (X) Environmental Impact Statement

Department of the Interior, Bureau of Land Management

1. Type of Action: Administrative (X) Legislative ()

2. Abstract: The Bureau of Land Management (BLM), as part of their planning process for the Mountain Valley Planning Area and in response to a suit filed in 1973, has prepared this Environmental Impact Statement (EIS). BLM proposes to implement livestock management on 90 allotments in the Sevier River Resource Area of the BLM Richfield District. The planning area contains 499,972 acres of public lands located in Piute, Sevier, Sanpete, and Wayne Counties in south-central Utah. Development of management alternatives (listed below) involved identifying and analyzing conflicts between resource values while preparing the Management Framework Plan. This EIS analyzes the environmental, cultural, and socioeconomic consequences of the management changes and the improvements of the associated range developments. Vegetation production and ground cover would increase, overall watershed conditions, wildlife habitat, and surface water quality would improve, soil erosion would decrease, and regional income would increase in all alternatives except Alternative E, Continue Present Management. Proposed range developments would somewhat degrade the area's scenery. Continued soil erosion, cattle trampling, and some range developments would slightly disturb cultural resources. Riparian areas would improve only in Alternatives A and D. Ranch income and capital values would decrease in some alternatives.

3. Alternatives Analyzed:

- A. Optimize Non-Livestock Resources
- B. Optimize Livestock Grazing
- C. Rangeland Management Recommendation
- D. Eliminate Livestock Grazing
- E. Continuation of Present Management
- F. Adjust Spring Livestock Use

4. Comments have been requested from the following:

See DEIS for a list of agencies, groups, and individuals from whom comments were requested.

5. For further information contact:

Alan Partridge, EIS Team Leader
Bureau of Land Management
Richfield District Office
150 East 900 North (P. O. Box 768)
Richfield, Utah 84701
Telephone: (801) 896-8221

6. Date final statement made available to EPA and the public:

September, 1980.

TABLE OF CONTENTS

	<u>Page</u>
Summary	1
Coordination, Consultation, and Review of the Draft Environmental Statement	11
Comments and Responses - Written	13
Comments and Responses - Oral	55
Text Revisions	60

NOTE TO READER

The Draft Environmental Impact Statement for the Mountain Valley Grazing Management proposal was distributed in May 1980. Comments received on the document did not require significant changes in data, analysis, or conclusions. Therefore, the entire contents were not reprinted as a part of this Final volume. A limited number of copies of the Draft EIS are available upon request to:

District Manager
BLM District Office
P O Box 768
Richfield, Utah 84701

This Final Environmental Impact Statement contains information obtained during the coordination, consultation, and review of the Draft EIS. Chapters 1 through 4 of the Draft are incorporated herein by reference. Corrections to the document are made in the section entitled Text Revisions.

SUMMARY

This statement analyzes the effects of six alternative range management programs for the Mountain Valley Planning Area developed by the Bureau of Land Management (BLM). Based on this analysis and additional public involvement, a range management program will be selected by BLM for the 499,972 acres of public lands in the planning area.

The planning area is located in south-central Utah and includes substantial areas in Sanpete, Sevier, and Piute Counties and small areas in Garfield, Wayne, Millard, and Juab Counties. It is approximately 114 miles long and has a total area of 689,175 acres within the allotment boundaries. Seventy-two percent (499,972 acres) of this area is BLM administered public lands; the remaining lands are State (16 percent, 106,714 acres) and private (12 percent, 82,489 acres). See Summary Figure 1.

The need for positive action has been recognized by BLM. Resource inventories show that basic soils, vegetation, and wildlife resources are in poor to good condition, with some valuable aspects deteriorating. One of the causes is the present level and methods of livestock grazing on public lands.

BLM has identified, through its multiple use planning process, several alternatives that could overcome these problems and they are, to varying degrees, compatible with the needs and goals of area residents. Alternatives C and F are environmentally preferred; however, action from each of the alternatives could be selected by management following the completion of the EIS process.

As a part of the planning process, continuing public involvement (scoping) has identified significant issues which are considered in this statement and form the basis for the proposed alternatives. This public involvement serves to sharpen the focus of this statement, influencing not only the development of alternatives, but also the level of detail and depth of analysis of the effects of implementing any one of the six alternatives.

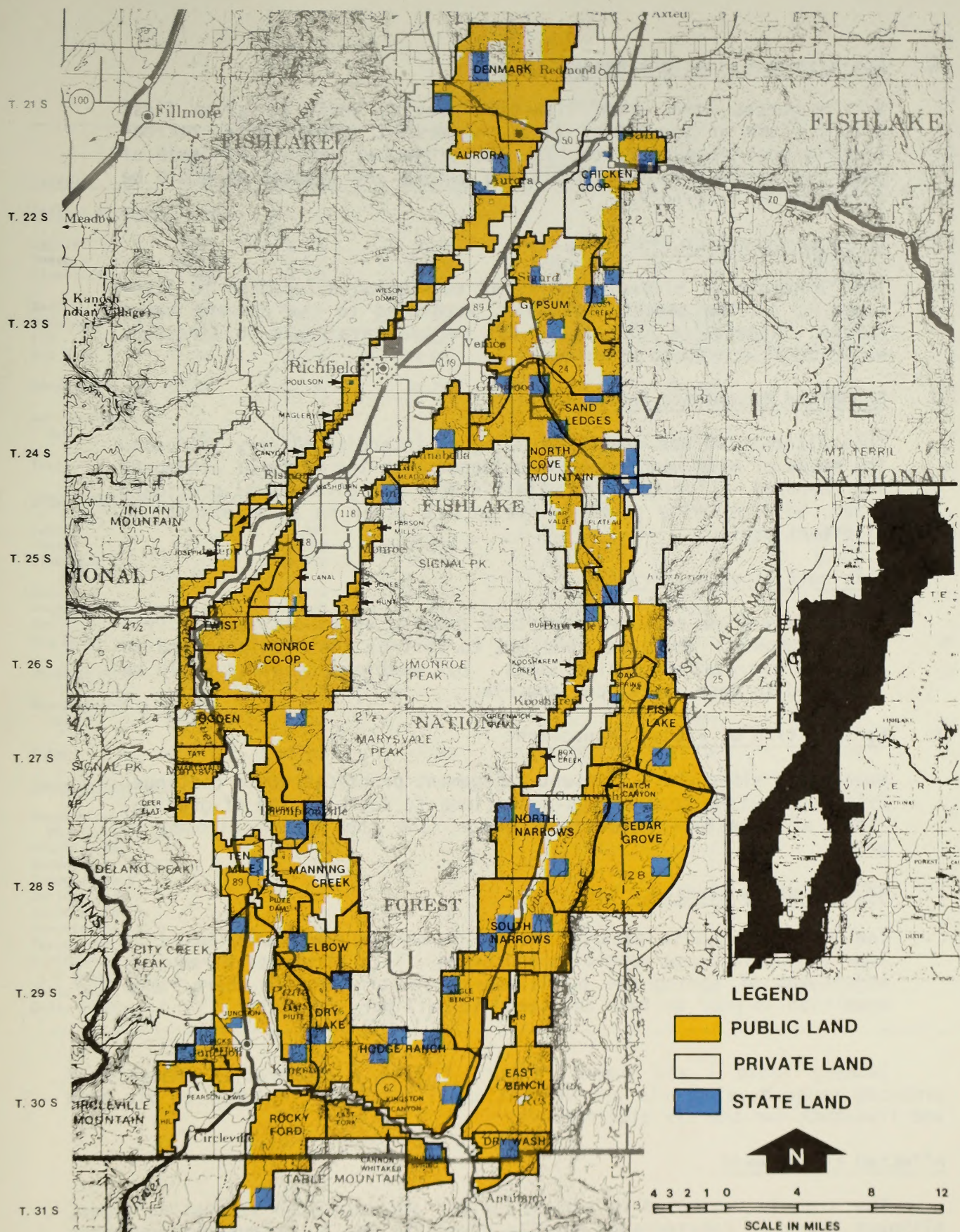
Most issues raised during the scoping process centered on livestock grazing and socioeconomic concerns such as level of grazing, season of use, and the degree of management/control required to implement improved range management in the planning area. Other issues of concern were increases in wildlife, habitat condition, recreation, and visual resources as they relate to livestock grazing.

During the review of comments on the draft EIS, most of the concern centered around permittee input to the planning and management, pertinence of the range survey, wildlife numbers, and the process to be followed in making management decisions. There were also comments which questioned the analysis. Riparian vegetation is of special interest, and opinions vary as to how it should be managed. The comments have helped by making word changes which improve the accuracy of the draft.

This statement analyzes the environmental consequences of each of the six alternatives on the affected environment.

Alternatives

The six alternatives vary in level of allocation, range developments, allotment combinations, and grazing treatments proposed. Management objectives also vary from maintenance and protection to improvement and intensifying uses of existing resources. The alternatives are given below, together with a brief description of each.



A. Optimize Non-Livestock Resources

All resources other than livestock grazing would be given first priority use of vegetation (i.e., watershed, animal life, recreation, visual resources, etc.). The projected vegetation needs of other resources would be satisfied before any vegetation would be allocated to livestock.

B. Optimize Livestock Grazing

This alternative allows priority of vegetation allocation to livestock up to the amount available, according to the current range survey. Vegetation that could not be made available to livestock would be allocated to other uses.

C. Rangeland Management Recommendation

This alternative was developed using an interdisciplinary approach. The needs of each resource were balanced with the needs of a competing resource. Livestock and wildlife would be given equal consideration, with priority given to one or the other on an allotment-by-allotment basis.

D. Eliminate Livestock Grazing

This alternative excludes livestock grazing on public lands. Private landowners would be required to control their animals and to allow no trespass on public lands. All usable vegetation would be allocated to deer, antelope, and elk.

E. Continuation of Present Management

Under this alternative, present management practices would continue. Existing grazing permits would continue to set a period of grazing, kinds of livestock allowed to graze, and the number allowed to graze.

F. Adjust Spring Livestock Use

The purpose of this alternative is to manage rangelands based on improvement in range condition and trend. This alternative requires adjustment of spring use by livestock and/or wildlife where range condition is poor or fair and trend is declining or static.

Summary Table 1 and Summary Figure 2 give a comparative analysis of proposed range developments and vegetation allocations (in AUMs) to big game and livestock for the six alternatives.

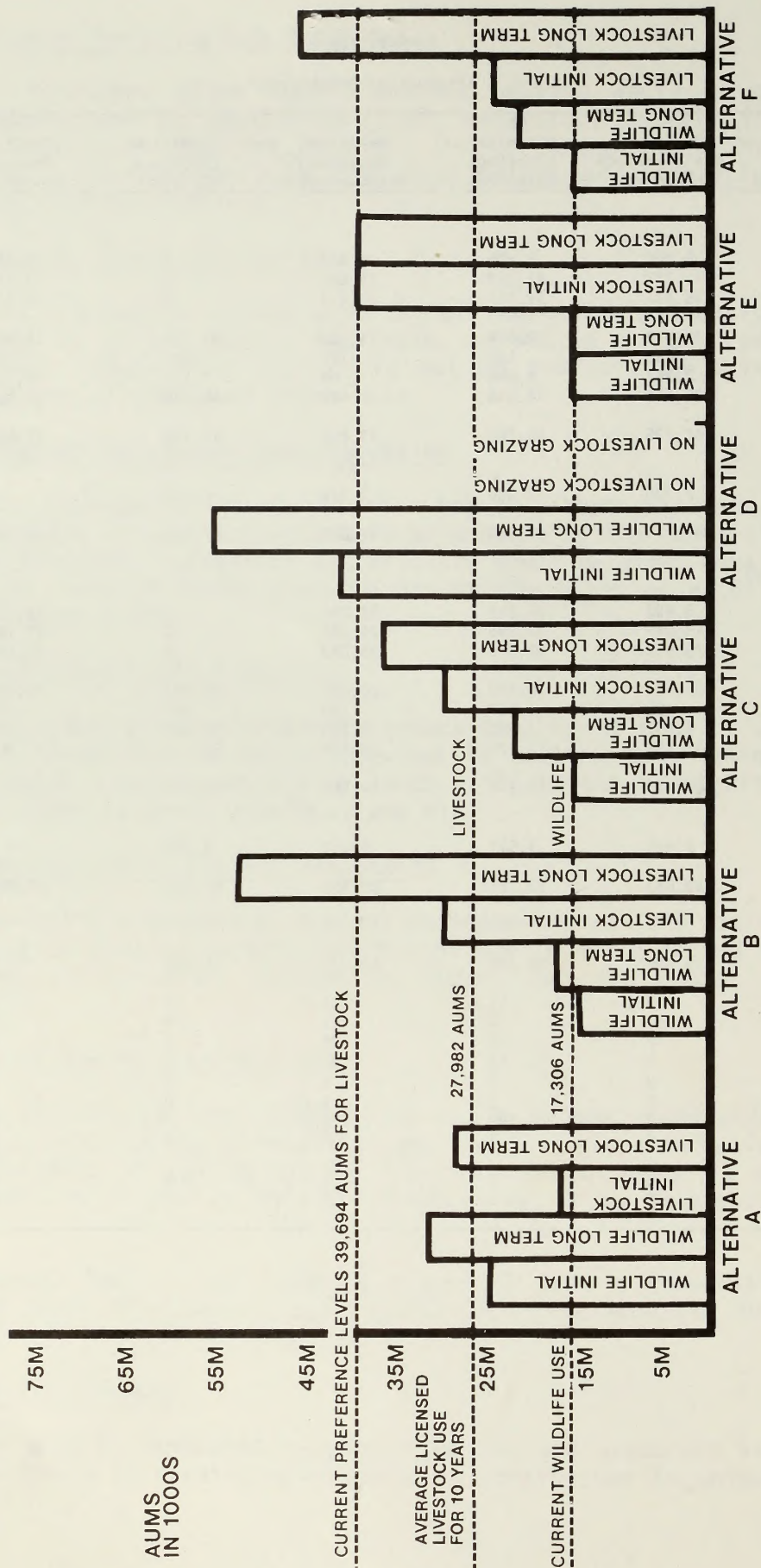
Affected Environment

The area is dominated by pinyon-juniper and sagebrush vegetation types, although there is considerable species diversity due to unique physiographic

SUMMARY TABLE 1

Alternative Comparisons

Category	Existing or Current Situation	A Optimize Non-Livestock Resources	B Optimize Livestock Resources	C Rangeland Management Recommendation	D Eliminate Livestock Grazing	E Continue Present Management	F Adjust Spring Livestock Use
<u>Initial Allocation (AUMs)</u>							
Cattle	9,039	5,200	9,899	9,484	0	12,495	7,559
Sheep	18,943	11,717	21,212	19,927	0	27,199	17,132
Livestock	27,982	16,917	31,111	29,411	0	39,694	24,691
Deer	15,460	22,619	12,874	14,622	33,151	15,460	15,296
Antelope	120	238	120	120	921	120	120
Elk	1,726	2,361	1,664	1,707	7,127	1,726	1,711
Big Game	17,306	25,218	14,658	16,449	41,199	17,306	17,127
Consumptive Use	45,288	42,135	45,769	45,860	41,199	57,000	40,189
Non-Consumptive Use	2,547	5,700	2,066	1,975	6,636	--	7,646
Total	47,835	47,835	47,835	47,835	47,835	57,000	47,835
<u>Long-Term Allocation (AUMs)</u>							
Cattle		9,493	20,391	12,282	0	12,495	16,452
Sheep		19,059	32,699	24,081	0	27,199	29,806
Livestock		28,552	53,090	36,363	0	39,694	46,258
Deer		26,774	14,999	20,656	43,904	15,460	19,290
Antelope		492	127	199	1,367	120	199
Elk		4,430	1,998	2,249	12,846	1,726	2,237
Big Game		31,696	17,124	23,104	58,117	17,306	21,726
Consumptive Use		60,248	70,214	59,467	58,117	57,000	67,984
Non-Consumptive Use		8,435	3,511	9,025	9,299	0	12,917
Total		68,683	73,725	68,492	67,416	57,000	80,901
<u>Range Developments</u>							
Vegetation Modification (ac.)		15,900	38,475	40,270	6,850	0	27,610
Pipeline (mi.)		10.1	65.6	67.6	0	0	21.1
Reservoirs (ea.)		5	19	17	0	0	17
Troughs (ea.)		0	15	15	0	0	2
Spring (ea)		1	12	16	0	0	7
Raintrap (ea.)		0	2	6	0	0	2
Stocktrails (mi.)		0	3.5	4.25	0	0	3.5
Fences (mi.)		38	127.5	116.0	0	0	71.0
Enclosures (10 acres) (ea.)		0	4	4	0	0	2
Wells (ea)		0	1	1	0	0	0
Gully Plugs (ea.)		0	0	0	0	0	340



Summary Figure 2

INITIAL AND LONG TERM USE LEVELS FOR LIVESTOCK AND WILDLIFE PROPOSED BY ALTERNATIVE

and climatic features. About 37 percent of the area is in good range condition, 56 percent is in fair condition, and 7 percent is in poor condition. Trend in range condition is 87 percent static, 4 percent improving, and 9 percent declining. Forage inventories indicate that 47,835 AUMs of livestock and big game forage are presently available.

Although riparian vegetation occupies less than 1 percent of the planning area, it is unique and important to livestock and wildlife. Riparian vegetation is associated with about 40 miles (488 acres) of perennial stream and is also established around reservoirs, springs, and seeps. While the condition of the riparian vegetation is unknown, it is assumed to be in poor condition. However, fenced portions (about 2 miles) of Otter Creek and the Sevier River may be in good condition.

Soil types are also diverse, reflecting the influence of climate and geology. Soils are characterized by low organic matter content and most have limited development and structure. The majority of soils found in the planning area consist of a silty clay sand mixture (loamy) and are subject to water erosion. Currently, 3 percent of the area is in stable erosion condition, 34 percent in slight erosion condition, 51 percent in moderate erosion condition, 1 percent in severe erosion condition, and 11 percent in critical erosion condition.

Most of the perennial streams are small (3 feet or less in width), subject to flooding, and provide poor quality fish habitat. Most streambanks are in poor condition. Few stream sections (16 miles) support or have the capability of supporting populations of sport fish.

The area is important big game habitat for deer, elk, and pronghorn antelope. Only one allotment in the planning area is rated in good habitat condition by the Utah Division of Wildlife Resources; most of the others are rated in poor condition.

Deer numbers are currently low and are expected to increase. Elk numbers are increasing in the planning area, and antelope numbers are currently static. The bald eagle and peregrine falcon are found in the planning area. However, most of their important habitat is found on private lands. The population of the Utah prairie dog, which inhabits one allotment in the planning area, is thought to be increasing.

Most of the 111 livestock owners using BLM rangelands run cow-calf and ewe-lamb operations. The planning area provides about 3 percent of the public land cattle AUMs and about 7 percent of the public land sheep AUMs in Utah.

Important recreational activities include sightseeing, camping, picnicking, hunting, fishing, off-road vehicle use, snowmobiling, and cross country skiing. Visitor use is increasing and occurs year-round. There are no lands in the planning area with wilderness values.

The number and size of operators in the planning area and their seasonal dependency are shown below:

<u>Size Class</u>	<u>Number</u>	<u>Percent Seasonal Dependency on BLM</u>
Small cattle operators (1 to 99 head)	42	11
Medium cattle operators (100 to 199 head)	14	6
Large cattle operators (200 head or more)	14	7
Small sheep operators (less than 199 head)	6	58
Large sheep operators (200 head or more)	35	48

The area is rural, and lifestyles reflect a strong agricultural dominance, although agriculture's economic importance is declining. In terms of income and employment, government (local, State, and Federal), service and trade, transportation, mining, and construction sectors dominate the economies of the local communities. Residents are characteristically self-reliant, strong-willed people whose independence reflects the traditional western lifestyle.

Environmental Consequences

Analysis of impacts was performed by an interdisciplinary team. The potential effects of implementing each of the six alternatives were evaluated in relation to changes in the existing situation. The results of this analysis are summarized in Chapter 4. Significant impacts by alternative are shown in Summary Table 2.

Range Management Decision

This EIS is part of the BLM's decision-making process. An opportunity for additional public involvement is available. Comments dealing with the adequacy of the analysis and other relevant matter may be made during a 30-day period after the final environmental impact statement is completed. No decisions will be made until the completion of that period.

Following this, BLM will develop a range management decision which will be made available to the public. This decision will establish the BLM range management program for the Mountain Valley Planning Area.

SUMMARY TABLE 2

Comparison of Environmental Consequences^a

Resource Category ^b	A Optimize Non-Livestock Resources	B Optimize Livestock Resources	C Range Land Management Recommendation	D Eliminate Livestock Grazing	E Continue Present Management	F Adjust Spring Livestock Use
Vegetation	Beneficial	Beneficial	Beneficial	Beneficial	Adverse	Beneficial
Soil	Beneficial	Beneficial	Beneficial	Beneficial	Adverse	Beneficial
Water Resources	Quality Beneficial Quantity Adverse	Quality Beneficial Quantity None	None	Beneficial	Adverse	None
Animal Life	Beneficial	Adverse	Beneficial Big Game Prairie Dog Adverse Sagegrouse Fish	Beneficial Unknown Prairie Dog	Adverse	Beneficial Big Game Adverse Prairie Dog Sagegrouse Fish
Livestock Grazing	Adverse	Beneficial	Beneficial and Adverse	Adverse	Adverse	Beneficial
Recreation	Beneficial	Beneficial	Beneficial	Beneficial	Adverse	Beneficial
Socioeconomics	Beneficial	Beneficial to Agricultural Sector None to Wildlife sector	Beneficial	Adverse to Agricultural Sector Beneficial to Wildlife Sector	Adverse	Beneficial

^aTo evaluate the impacts for inclusion in this table, the following question was asked, "Resource environment would undergo what kind of consequences in the long term?".

^bVisual and cultural resources are not listed because they would not experience any significant consequences.

COORDINATION, CONSULTATION, AND REVIEW OF THE MOUNTAIN VALLEY GRAZING
MANAGEMENT DRAFT ENVIRONMENTAL IMPACT STATEMENT

The DEIS was filed with EPA and made available to the public on May 22, 1980.

July 21, 1980 was established as the deadline for submission of written comments.

Public hearings were held July 8, 1980 at Junction, Utah; July 9, 1980 at Manti, Utah; and July 10, 1980 at Richfield, Utah. Copies of the hearing transcript, along with the attendance list, are available for public review at the BLM offices in Salt Lake City and Richfield, Utah.

The list of agencies and others that have requested copies of the DEIS is available for review at the BLM District Office in Richfield, Utah. The Draft EIS contains a list of agencies, interest groups, and individuals from whom comments were requested.

Substantive comments received too late for inclusion and response in this FEIS will be answered individually by mail. The late comments and responses, as well as all comments contained herein, will become a part of the project file maintained in the Richfield District Office located at Richfield, Utah, and will be given consideration along with the environmental impact statement during the decision-making process.

All timely written comments and oral testimony from the public hearing were reviewed for consideration in preparation of this FEIS. Those comments that presented new data, questioned facts and/or analyses, and raised questions or issues bearing directly upon the DEIS were responded to by BLM. Letters which were general or did not contain substantive comments were reviewed but no response was made.

COMMENTS

Comment letters are listed below. A response was not necessary for those marked with an asterick(*).

<u>Comment Letter</u>	<u>Letter Number</u>
National Wool Growers Association, Inc.	1
State of Utah, Department of Health	2
*Paul P. Leitz	3
Van A. Wiley	4
Utah Wool Growers	5
*U.S. Department of the Interior, National Park Service	6
*Advisory Council on Historic Preservation	7
U.S. Department of the Interior, Geological Survey	8
Charles W. Lund	9
U.S. Department of the Interior, Water and Power Resources Service	10
*Robert Olson	11
U.S. Environmental Protection Agency	12
Utah State University, Cooperative Extension Service	13
State of Utah, Office of the Governor	14
U.S. Department of Agriculture, Soil Conservation Service	15
Afton M. Hansen	16
Gayle G. and Grant R. Hansen	17

Garth Ogden, Sevier County Farm Bureau	18
G. Douglas Willden	19
U.S. Department of the Interior, Fish and Wildlife Service	20
Intermountain Mustang Association	21
Kay Frischknecht	22

<u>Oral Testimony From the Public Hearings</u>	<u>Comment Number</u>
Van A. Wiley	1
Van A. Wiley	2
Van A. Wiley	3
Phil Allen	4
Raymond S. Dawson, Utah Farm Bureau	5
Lee Bartley	6
Neil Neilsen	7
Kay Frischknecht	8
Mr. Barton	9
Kay Frischknecht	10
Francis Mortenson	11
James Olsen	12
David Madsen	13
Kent Gregersen	14-21



COMMENTS ON THE DRAFT EIS
MOUNTAIN VALLEY GRAZING MANAGEMENT

June 10, 1980

District Manager
Bureau of Land Management
150 East 900 North
Richfield, UT 84701

Dear Mr. Pendleton:

Attached are written comments in reference to the draft Mountain Valley Grazing Management Environmental Impact statement as forwarded to our office recently.

We respectfully request your consideration of this material in the final EIS.

Sincerely,

Marv
Marv Cronberg
President


MC:fc

Encl.

As suggested in the cover letter received with the draft EIS, these comments are directed to the contents of the document and to specific aspects of the grazing management alternatives. We cannot accept Alternative A, Optimize Non-livestock Resources, because of its initial grazing reductions. The long term aspects are certainly attractive, but the loss of 40% of the current allotment would be devastating to the producers involved.

Alternative D is also non-acceptable, and we do not feel like this alternative was worthy of legitimate consideration in the report. Alternative B failed to recognize the productive potential of the public lands resources. We feel this approach would be indefensible for the Bureau of Land Management as well as unrealistic for the grazing resource users.

Consequently we endorse Alternative C, Rangeland Management, as the most comprehensive and ultimately beneficial use of the resources in the Mountain Valley District. We would offer the following specific comments on the analysis of impacts to Alternative C listed on Pages 4-48 to 4-65 of the draft EIS. It is extremely unfortunate that the document is incomplete because of a lack of detailed soils information as noted on page 4-52. Soils are a product of climate and base material, and as such, directly influence the amount, type and extent of plant cover. It appears that some of the judgmental decisions as noted in the report, are highly speculative without this important information.

NATIONAL  GROWERS ASSOCIATION, INC.

600 Crandall Building / Salt Lake City, Utah 84101 / (801) 363-4483

On page 4-50, and on page 4-52 a discussion about soil particle movement and the condition of the unfenced riparian vegetation are especially weak because of the lack of soil data. Again on Page 4-54 the report notes that no comprehensive studies have been completed on stream bank areas in the planned area and it is expected that over-utilization has left riparian areas in a deteriorated state. From our experience, we would suggest that application of range management techniques, i.e., range improvements, as noted elsewhere in the report would have a significant effect on both the riparian vegetation and the soil movement. The improved distribution of livestock and wildlife, the increased percolation rates and correlation with stream flow and the stabilization effect on both stream flow and temperature range would have a tendency to reduce sediment inflow, improve the riparian vegetative areas and subsequently stabilize or improve the fishery. The foregone assumption that increased AUM allocation to both livestock and wildlife will automatically result in a decreased fishery is not true, where adequate range distribution techniques have been applied. Non-point inflow, referred to in the report as "overland runoff," would be significantly reduced throughout the watershed under Alternative C. We believe this is an important consideration to the ultimate assessment of the fishery.

No mention was made of the allocation of AUM's to the prairie dog, either at present or in the future. Also, since prairie dogs have a propensity to denude large areas for security, and to graze a peripheral area around the dog town,

we believe that some attention should be given to the extent of the intended propagation. Present populations may be so small as to preclude an assigned AUM value. But should the population increase, as would be expected, it could become a factor. This aspect should be considered in the wildlife delegation of grazing units.

On page 4-57, references to the impact on the sagebrush strutting grounds from increased sheep grazing does not take into consideration the increased vegetation. The situation is relative, and unless the impact is negative now, then the increase should not be negative later when increased forage is available under the management plan. Also, since strutting grounds are normally small in area, and quite distinct, grazing could be withheld from this particular area during the strutting period.

The report does not state the time of use for this expected increase in numbers of livestock in the Cedar Grove allotment although the use by the sage grass is characteristically confined to a specific period each year. I don't believe this is a problem and should be looked at more objectively. On page 4-61 under the summary, items two and three need to be reevaluated with reference to previous comments. I question the structure of the graph on page 4-64 where the value and percent changes between livestock grazing and big game hunting are compared. While these figures may accurately reflect which changes should be expected to occur, without additional information demonstrated the present market share of the economy of each segment, the graph appears

1.5 | lopsided towards livestock economy. This gives a false impression accrued to the resources under Alternative C.

We would encourage the B.L.M. to reconsider those areas noted above in the final EIS.

Responses to Letter 1

1.1 Since new data is not available, it is still assumed that most riparian vegetation in the planning area is not in a satisfactory condition, and that most soils in these areas are currently eroding. All fishing streams except the fenced portions of Otter Creek are rated by the UDMR (1970) as being in fair to poor condition. Any grazing of riparian vegetation beyond the current levels under these conditions would result in a deterioration of the fishery. This would result because of heavy grazing and trampling and compaction of the soil along streams. Under Alternative C, grazing by livestock and big game in the long term would be increased to over 135 percent, and fencing would only improve one fishing stream, 2.5 miles of Lost Creek. Therefore, there would be a decrease in the quality of the fishery.

1.2 The allocation of AUMs to prairie dogs, rabbits, insects, and other small wildlife species is considered in the proper use factor for all vegetation. (See pages 2-1 to 2-3 for a discussion of vegetation allocation.) If Indian ricegrass, for example, is given a proper use factor of 50 percent, that means that within the remaining 50 percent there would be ample forage to take care of all the other users of Indian ricegrass and still leave enough of the plant to keep its vigor and vitality for the following year's healthy growth. The expected increase in prairie dogs has been taken into consideration for future allocation computations.

1.3 As Jarvis (1974) pointed out in his study, there is a direct competition between sheep and sagegrouse for succulent spring forage particularly in and near strutting grounds. It is an impact to sagegrouse now and would be in the future as long as the season of use remains the same, and as long as there is a predicted increase in the number of livestock grazing the area.

Grazing could be withheld from strutting grounds, but that is not a part of any of the proposed actions. Also, some grazing during the proper seasons may be necessary to maintain strutting grounds. On-the-ground planning would be done in the preparation of AMPs and protection to sagegrouse strutting grounds would be provided.

Scott M. Matheson
Governor



STATE OF UTAH
DEPARTMENT OF HEALTH
DIVISION OF ENVIRONMENTAL HEALTH
150 West North Temple, P.O. Box 2500, Salt Lake City, Utah 84110

Alvin E. Rickers, Acting Director
Room 426 801-533-6121

533-6108
June 9, 1980

James O. Mason, M.D., Dr. PH.
Executive Director
801-533-6111

DIVISIONS
Community Health Services
Environmental Health
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Health Care Financing
and Standards

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Health Planning and
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Medical Examiner
State Health Laboratory

District Manager
Bureau of Land Management
150 East 900 North
Richfield, UT 84701

Dear Sir:

We have reviewed the Draft Environmental Impact Statement (DEIS), Mountain Valley Grazing Management, and have the following comments:

It is noted that all except alternative E would propose prescribed burning of various amounts of the rangeland. Our office would especially be concerned if alternative B, C, or F were selected which would burn 4,670, 4,670 or 1,900 acres respectively.

The impact of these burns on Air Quality have not been addressed in the DEIS and the document will not be complete until these factors are considered. Burns of the magnitude suggested would have a significant impact on air quality and in all probability violate Section 169A of the Clean Air Act which required visibility protection for mandatory Class I Federal areas where it has been determined visibility is an import value.

Sincerely,

Brent C. Bradford
Director
Bureau of Air Quality

FBC:il

2.1

1.4 The current season of use on the Cedar Grove Allotment is May 10 to June 30 for cattle; and October 6 to January 15 and from May 26 to June 30 for sheep.

No changes in these seasons of use are proposed under Alternative C (see Appendix I-1, Table A, and Appendix II-1, Table C). Under Alternative C, sheep use would increase from 1,063 to 1,665 and cattle from 110 to 324. This is an increase of 816 AUMs. The critical incubating/brooding period for sagegrouse is from about May 1 through June 1. The proposed season of use under Alternative C would allow an increase in use during 20 days of this critical sagegrouse reproduction period, and an unavoidable increase in sagegrouse/livestock competition.

As stated on Page 4-19 under the subheading Sagegrouse, the limiting factor for sagegrouse in this planning area is the inability of the brood habitat to produce sufficient food except in exceptionally wet years (Jarvis, 1974). Therefore, the prediction of a decrease in sagegrouse hunter days (item 2 Page 4-61) is a correct one which has been supported by the available literature.

The prediction of a decrease in fisherman days (item 3 Page 4-61) is due to the predicted deterioration of unfenced riparian zones. Because most of the riparian vegetation in the planning area is currently in poor condition, any increase in livestock, particularly cattle, would worsen this already undesirable situation. This contention is supported widely in the literature, as stated in the Riparian Vegetation section, Page 4-32. (See also Letter Response 1.1).

1.5 The following table presents baseline data from the regional economy. These figures will assist in putting the projected changes in perspective.

	Total Gross Output	Labor (Person Years)	Income
Total Regional Economy	\$511,691,496	14,674	\$118,449,981
Agriculture--Livestock (Baseline)	\$43,793,621	1,541	\$6,246,496
Agriculture--Livestock (Percent of Total Regional Economy)	8.6	10.5	5.3
Recreation--Services (Baseline)	\$249,796	13	\$71,035
Recreation--Services (Percent of Total Regional Economy)	0.05	0.09	0.06

Response to Letter 2

2.1 The impact of the prescribed burns on air quality was not discussed because of its very short duration. It should be noted that the total acreage would not be burned at the same time but would be burned at various times over a 5-year period and involve several allotments, as shown in Appendixes II-1 and II-6. The maximum single burn would be 1,400 acres (Appendix II-1). The burns would comply with State of Utah Air Conservation Regulations regarding the minimum clearing index for burning (see Page 2-26). The chances of exceeding Section 169A of the Clean Air Act are very small because of various factors such as topography, distance from Class I area, and the small amount of acreage that would be burned at one time.

COPY FOR THE RECORD

District Manager
Bureau of Land Management
150 East 900 North
Richfield, Utah 84701

30 May 1980

Dear Sir:

Regarding your pending hearings on grazing management in the Richfield District, I wish to provide some comments.

I, like many other Utah residents, have watched with considerable alarm the degradation of our mountain areas due to overgrazing by livestock (primarily cattle in the areas I have observed). For example, a few years ago I and my family had been making regular annual deer hunting trips to the Salina Canyon area near Mt. Kusinia (North-East of Salina). We noticed a rapid increase in the number of cattle being grazed in this area. About 4 or 5 years ago (just prior to the time the deer hunting began to decline badly, the range was just about completely saturated with cattle. Virtually all of the edible wildlife and cattle food was either chewed up, trampled down, or defecated on by cattle. It came as no surprise to me the following year when the deer hunting just about fell right out the bottom. Of course the authorities (Fish & Game etc.) blamed this problem on the weather and other factors, but the problem of overgrazing on public lands was very carefully avoided. That same year when we noticed the heavy overgrazing a rather interesting thing happened. We were sitting around the campfire when a Government BLM or Forestry Service man drove up. We had a chat with him over a cup of coffee and I gradually began to question him on the subject of just how many cattle and big game animals the range would support and which had priority. It was clear that he realized just where the conversation was leading as he got a rather upset look on his face and excused himself abruptly.

It is now pretty apparent that the BLM (and others) knew full well that heavy overgrazing was rapidly destroying the state big game herds in many areas. We noticed a significant reduction in the numbers of cattle in the Salina Canyon area a couple of years after our talk with the BLM man in our camp. Unfortunately the damage had been done and it will probably be several years before the range in the area we hunt supports a really good big game herd again.

As you can easily see I am not in favor of giving the sheep and cattle men a blank check to our national forest lands. A small amount of carefully controlled cattle grazing may well be a good idea. Make no mistake about it though, the voting hunter population can be a significant and formidable foe if you allow what took place a few years ago to be repeated. In my not particularly humble opinion, the state big game herds should be given a priority in attempting to allocate range use where big game herds are, or have been the dominant residents of the area. I suspect that most of the voting public here in the State of Utah feel pretty much the same way.

Sincerely,

Copy Furn: Salt Lake Tribune
Sports Editor

Paul P. Lietz
702 East 3155 South
Salt Lake City, Utah 84106

page 2

Mr. Donald Pendleton

June 16, 1980
Antimony, Utah

Mr. Donald Pendleton
Richfield, Utah

Dear Mr. Pendleton:

In your draft environmental impact statement, the proposal to include my Dry Wash allotment in the proposed new Otter Creek allotment prompts this letter.

We worked long and hard over a number of years under the administration of Mr. Bob Krumm to get these allotments set up the way they are now and the results have been very satisfactory to me, and have to this point presented no major problems with B.L.M.

On numerous occasions since I first became aware of the proposal to combine, I have expressed my opposition in a public hearing in Junction, in a hearing in Richfield, numerous times to the staff and manager of the Sevier River Resources area and to Mr. Vernon Davis, all to no avail.

I am currently holding B.L.M. permits in addition to the Dry Wash one, in the Antimony Creek allotment and the East Bench. Both of which require running in common with several other permittees and both involving problems.

The Dry Wash allotment is currently administered by the Cedar City office via Escalante. My experiences in the East Bench allotment in particular have been very frustrating and unsatisfactory. The other permittees have consistently turned out on the allotment too early and have not removed their livestock by the closing date in addition to grazing more cattle than they were allotted. This year, for example, none of them made any attempt to remove their livestock for several days after the 31st of May. At least 40 head were not removed for 10 days to 2 weeks later.

My complaints in the past have been ignored as has my desire to have a common open and closing date.

In addition, since the Dry Wash has not been administered for a number of years out of your office, the data which is presented in the E.I.S. statement is not accurate. The actual use is not even close and the wildlife use grossly under estimated.

I would appreciate your immediate response on this issue.

I repeat, I strongly object to the Dry Wash allotment being included in the new Otter Creek allotment. It will only add to my problems and not solve any administrative problems.

The Dry Wash allotment ajoints my private land, making a very satisfactory arrangement. Under the new proposal, I would be required to move my cattle considerable distances in some instances.

Your truly,

Don E. Ziegler



10 WEST 100 SOUTH
SUITE 600
SALT LAKE CITY, UTAH 84101
TELEPHONE 385-3972

OFFICERS

HATCH HOWARD
Wool Growers
President

MALCOLM YOUNG
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RUSSELL RYAN

RAY STALEY

JOHN WINTCH

SANDY WEBSTER

WARREN WILLIAMS

JOHN WINTCH

MALCOLM YOUNG

Responses to Letter 4

4.1. The concerns of permittees in regard to allotment consolidation were one of the major reasons for the inclusion of Alternative F (Adjust Spring Livestock Use). Alternative E (Continue Present Management) would also allow the present allotment boundaries to continue. The needs of the livestock operator will be taken into account when the decision is made as to which alternative will be used on any allotment or group of allotments. However, the condition of the soils, vegetation, wildlife, etc., will also be taken into account. The allotment consolidations were designed primarily to favor these resources.

The varying opening dates have resulted from management working with individual permittees. The continuation of that situation would be dependent upon agreements between management and permittees. However, all grazing would be within the season of use given in Appendix II-1, Tables A through F.

4.2 Checking BLM records showed that the Dry Wash Allotment's average use was 158 AUMS instead of 177. This is because 90 AUMS were used in 1977 instead of 216 (as shown in Appendix III-6) according to the actual use record. This change will be considered when doing the allotment analysis and prior to the program decision. Corrections are noted in the text revision section.

4.3 The current deer and antelope numbers were derived from the best data available at the time. As a part of the monitoring program, additional data will be collected on the livestock and wildlife numbers, use, distribution, etc. The numbers in the EIS will be further refined when AMPs are developed in cooperation with the rancher and when habitat management plans are developed with assistance from UDWR.

June 18, 1980

Donald R. Pendleton
District Manager
Bureau of Land Management
150 East 900 North
Richfield, UT 84701

Dear Mr. Pendleton:

Thank you for submitting your draft on Mountain Valley
Grazing Management (EIS).

We have reviewed the Impact Statement carefully and I
am certain we view some statements with differences
of interpretation.

Regarding the alternatives in which you select to operate
under and have identified. It is agreed that any alter-
native or certain combinations of alternatives could be
used, however, in reviewing all phases possibly alterna-
tive C, "Rangeland Management" fits Wool Growers more
closely and reasonably, however several problems seem
to stem as:

- 5.1 | 1- Initial reductions of 20% of all livestock. Does
this mean a straight 20% reduction of all livestock
from preference use or actual use?
- 5.2 | 2- Do the individuals under no. 2 (4-59) then get an
additional 27 percent reduction.
- 5.3 | In reviewing the McClure Amendment which passed Congress

on November 9, 1979, the amendment banned BLM from making any grazing reductions over 10% in one year. The 10% limitation applies not only to new reductions but any past reduction ordered by the BLM in 1979. Also the bill states that appeals can be made within 30 days after a receipt of a final grazing allotment decision.

It would appear the statement on page 4-58 (1) and 4-59 (2) would be invalid and could not be implemented as outlined. (3) page 4-59 (4) suggests an increase in initial allotment on 35 allotments.

At anytime an allotment has a reduction why not look at the individual and make a place for the individual. If increases are allocated in other areas, why not give the individual being reduced the opportunity to respond to a transfer to areas unused? We feel a reduction that compells an operator to go out of business or reduce his economic status on BLM land, then the BLM should have an obligation to help keep the individual in business not just drop them, when allotments are available. We recognize where an individual rancher has developed his allotment by good management and he is entitled to an increase. A poor manager should not be compensated or allowed that increase on the good manager's allotment.

The McClure Amendment states "The Secretary of the Interior shall develop criteria for extending on a case-by-case basis, the period allowed for phased livestock reductions on public

rangelands administered through the Bureau of Land Management up to five years. Such criteria shall take into account available agricultural assistance programs, the magnitude of projected livestock reductions, alternative pastureage available and ability of such public rangelands to sustain such phasing in of livestock reductions without damage to rangeland productivity." Again when reductions are made in one area there should be opportunity for those individuals who receive a reduction to participate in areas where increases are to be made or use vacated allotments and this responsibility is with BLM.

In each section mentioned is made of long-term use (20) years. This is talking of another generation. Again individuals are not being considered. BLM has had management of these ranges since 1936, that's 44 years and two generations, yet the BLM management has not effectively affected the ranges, but now it's livestock reduction planned in face of wildlife increase.

This brings us to another issue, increased Wildlife. According to BLM manual "Procedures will be followed in conducting range-land and habitat studies. Periodic inspections will be conducted to insure compliance with terms of AMP's (allotment management plans). Monitoring studies will include: Actual use, utilization, climate analysis, rangeland condition and trend, herbage production, and plant phenology. To evaluate effects of the AMP's on total resources, other studies will also be necessary to monitor wildlife habitat, riparian habitat, threatened and

endangered species, cultural resources, wilderness and competition between livestock and wildlife (Bighorn Sheep, Antelope and Mule Deer.) Results of these evaluation studies will be used to monitor and refine grazing systems and determine allowable livestock use. AMP's may be revised on the basis of these studies."

5.4

The above statement regarding Monitrotring, Evaluation and Revision of BLM lands is not conducive to livestock, but only allows livestock when everything else is take care of first. Then and only then will livestock be considered. Why not include reductions of other species when reducing livestock and so state in your impact statement? Why not consider private land when considering species other than livestock in filling forage requirements?

No wonder we have a so called "Sagebrush Rebellion". It appears BLM past performance justifies the cause.

Over the years BLM performance has not developed confidence in the users of public lands there are not enough good results for them to justify so doing.

The question now arises what does this EIS really mean? To us it means hours of time, thousands of dollars spent that could have been put to far more beneficial usage than the report.

To us it means more bureaucracy--less input by local individuals and greater Federal Government control and waste with little if any consideration for individuals now. And, in terms of the

future the record does not justify the reports on hand, and too many EIS reports have been made with too much bias for environmentalists and others who fail to recognize multiple use on a public lands. Keep in mind if livestock were not used much of the public land resource would not be renewable.

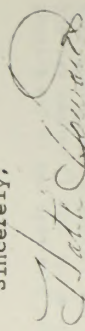
5.5

There are many alternatives to improve ranges just cutting livestock permits is the solution. Have you considered that livestockmen have been adjusting their own livestock numbers to help save and preserve the public lands? Preference use should be considered.

We recognize and appreciate your many pressures however, we feel livestock should not be at the bottom of the list and that currently livestock are considered only when everything else has been satisfied. Surely balanced adjustments could be made on everything equally and so stated not just "grazing of livestock must be reduced". These livestock people are the backbone of the state. Prior to your final draft and implementation we urge your consideration of the above problems.

This is not the opinion of just one but 1,000 sheepmen.

Sincerely,


Hatch Howard, President
Utah Wool Growers Assn.

Responses to Letter 5

5.1 On Page R-135 and Page 2-14 in the DEIS, it is explained that the basis for computing current level of use and changes from that level, was the average 10-year licensed use (this is considered then to be the actual use). In Alternative C, Page 4-58, No. 1 should say that there would be a 5-percent overall increase in AUMs for livestock (see also Page 2-14, Item 1a). That change is a 26-percent reduction from the preference as shown on Page 2-14.

5.2 No. 2 refers to that group of allotments shown in Appendix II-1, Table C (No. 3, Reduce Existing Levels of Livestock Grazing). This group of allotments would be reduced 27 percent below the current use.

5.3 A section of the McClure Amendment is included here and could be used as a guide for administrative provisions with respect to BLM livestock use decisions:

Provided further, that an appeal of any reductions in grazing allotments on public range lands must be taken within 30 days after receipt of a final grazing allotment decision or 90 days after the effective date of this Act in the case of reductions ordered during 1979; whichever occurs later. Reductions of up to 10 per centum in grazing allotments shall become effective when so designated by the Secretary of the Interior. Upon appeal any proposed reduction in excess of 10 per centum shall be suspended pending final action on the appeal, which shall be completed within 2 years after the appeal is filed. (emphasis added).

The text has been revised to read that the intent of the McClure Amendment could be used to make grazing reductions.

The amendment indicates that the BLM would limit Full Force and Effect decisions to 10 percent, pending Administrative appeals. The result of cooperative (BLM-permittee) range management would generally be unchanged.

It should be clearly understood, however, that the McClure amendment is effective only during fiscal year 1980. It does influence grazing use decisions made during calendar year 1979, but it would not have legal effect when the alternatives are chosen for the Mountain Valley grazing management decisions.

5.4 The statement referred to on Page 2-20 under "Monitoring Program" does not presuppose any increase in wildlife or any other user at the expense of livestock. It does say that all uses would be monitored, and that adjustments would be made on the basis of what is best for soils, watershed, and vegetation while staying within the parameters of the selected alternative.

The DEIS has considered reductions to other species (elk and deer) as well as livestock. Alternatives B, C, and F propose such reductions to wildlife. The purpose of the DEIS is to analyze the impacts of livestock and big game grazing on the public lands. Although it is realized that changes in the grazing on public lands can cause changes on private lands, those changes involve the private landowner and the UDWL. The solution to those changes must be worked out cooperatively among all interests prior to implementation of the Program Decision Document. BLM has no control over private land for allocation to wildlife. However, if an exchange-of-use agreement is in force, BLM can consider allocations to livestock on private and State lands.

5.5 It looks as if there is a typographical error in this sentence and that it should read, "...is not the solution." There is no single solution in range management; consequently, the DEIS includes combinations of different allocation levels, different grazing treatments, and different amounts of range developments in all of the alternatives. One of the alternatives considers the preference level grazing possibilities. We do recognize that many of the livestock operators have adjusted their own livestock use to help save and preserve public lands. In fact, it is the actual use (licensed use and not the preference) along with other factors that have resulted in the present range condition and productivity.



United States Department of the Interior
NATIONAL PARK SERVICE
ROCKY MOUNTAIN REGIONAL OFFICE

633 Parket Street
P.O. Box 25287
Denver, Colorado 80225

IN REPLY REFER TO:

L7621 (RMR)PC

JUN 23 1980

Memorandum

To: District Manager, Richfield District Office, Bureau of Land Management, Richfield, Utah

From: Associate Regional Director, Planning and Resource Preservation, Rocky Mountain Region

Subject: Review of draft environmental impact statement, Mountain Valley Grazing Management, central Utah (ER 80-36)

We have reviewed the subject document. No adverse effects upon jurisdictions of the National Park Service are identified with this proposal for grazing management, so we offer no comment.

Richard A. Strait
Richard A. Strait

6

Advisory
Council On
Historic
Preservation

1522 K Street, NW
Washington, DC 20005

Reply to: Lake Plaza South, Suite 616
44 Union Boulevard
Lakewood, CO 80228

June 20, 1980

District Manager
Bureau of Land Management
150 East 900 North
Richfield, Utah 84701

Dear Sir:

Thank you for your request of May 29, 1980, for comments on the draft environmental statement (DES) for Mountain Valley Grazing Management. Pursuant to Section 102(2)(C) of the National Environmental Policy Act of 1969 and the Council's regulations, "Protection of Historic and Cultural Properties" (36 CFR Part 800), we have determined that your DES appears adequate concerning our area of interest, and we have no further comments at this time.

Should you have any questions, please call Betty J. LeFree of my staff, at 303/234-4946, an FTS number.

Sincerely,

Louis S. Wall

Louis S. Wall
Chief, Western Division of
Project Review

Seal of the
National
Park Service

7



United States Department of the Interior

GEOLOGICAL SURVEY
RESTON, VIRGINIA 22092

JUN 30 1980

Memorandum

To: District Manager, Bureau of Land Management
Richfield, Utah

Through: Assistant Secretary--Energy and Minerals *[Signature]* JUL 1 1980

From: Director, Geological Survey

Subject: Review of draft environmental statement for Mountain Valley grazing management, Sevier River Resource Area, Utah

We have reviewed the draft statement as requested in your letter.

- 8.1 | The type of aquifer supplying the springs and wells of the Mountain Valley Area should be indicated to permit an appraisal of ground-water impacts and their relation to effects on surface-water resources.
- 8.2 | Mitigation measures to be used in the event of a herbicide spill should be indicated.

[Signature]
H. William Menard

Responses to Letter 8

8.1 The proposed ground water withdrawals for stock watering uses in Mountain Valley are so minimal in terms of the total unused ground water storage reservoirs that the impacts are probably insignificant. An increase in pumping of ground water could result in a slight increase in recharge to the aquifers and a slight decrease in the discharge from streams, springs, and flowing wells. Numerous springs issue from alluvium and floodplain deposits; however, many springs used by wildlife and livestock are above the valley floor. Consumptive use of these springs would have no significant impact on the ground water resource and its relation to surface water resources.

8.2 See Text Revision section, Page 2-25.

We have not been using all of the AUMs on the Lone Cedar Allotment that we could have with the available feed. The main reason why we have not licensed for more use on the allotment the past few years is that we have had to sell our summer range due to the extreme number of lambs and ewes we were losing to predators. In doing this, my current average license use is a lot lower than if I would have been able to use the allotment to its capacity. In reducing my numbers I can see a big improvement in grass cover and the vigor of the brush varieties. I feel that I should not be penalized for things that happen beyond my control such as being forced out by predator loss. Therefore, if any adjustment is made in the number of livestock to be grazed on my allotment by the use of the current average licensed figures, I sincerely hope you will take into consideration the reason for the low current use. Since we sold the sheep we have only been running about 200 head of sheep, and thus have not needed to license for any more than that amount. At the present time I am trying to obtain more summer range for sheep and also some summer range for cows.

I feel that my licensed use on the Lone Cedar Allotment should be figured on the use from 1976 to 1969 which are 8 years that are very reflective of the feed available for livestock use. I referred to Appendix III - 6 on page R-109 in making the following licensed use calculations.

Lone Cedar	No. of Operators	Preference	1979	1978	1977	1976	1975	1974
	1	1310 Sheep	294	247	109	1034	700	956
			1973	1972	1971	1970	1969	
			954	954	730	1310	1310	

The years 1979 1978 1977 } shows the use that I gave the allotment after being forced to sell our summer range and sheep because of predator loss to our lambs and ewes.

The years 1976 1975 1974 1973 1972 1971 1970 1969 } reflect a more accurate picture of how the allotment should be handled. The licensed use during these years was 993 AUMs which is a more accurate figure than 798 shown on Table F page R-46 and on other tables in this report.

9.2

July 1, 1980

United States Department of the Interior
Bureau of Land Management

Dear Sirs:

I have been reading this draft of the Mountain Valley Grazing Management Environmental Impact Statement, and studying the different alternatives that this draft presents. In my opinion one very bad and impossible idea in managing my livestock and the feed resources on the Lone Cedar Allotment is that of combining my allotment (Lone Cedar) with that of the Westside Allotment and the Swedes Canyon Allotment. The reasons for me making such a statement is that the operations on the individual allotments are so very different. They are as follows:

1. I breed my sheep to lamb early in the spring and like to use specific types of rams in my breeding program.
2. I vaccinate my sheep a couple of times during the winter and thus would have to bring them in at certain times, and having to separate my sheep out of a bigger herd would be a lot of work and an unnecessary inconvenience.
3. I run cattle along with my sheep, and I have to be very careful that my sheep take the higher mountain country and leave the lower and flatter country for my cows. If I do not manage the land this way, I have the major problem of over-grazing one area and running out of feed for my cows.
4. There is a great deal of private land, state land, and private leased land that I run on that is not fenced off.
5. We have went to a great deal of expense and time putting in roads so we can haul water and utilize the feed more effectively. We have also built corrals and fences and we have put cattle guards on the main roads on the allotment boundaries.

For these reasons, and others, I am very strongly against combining the Lone Cedar Allotment with any other allotment.

9.3

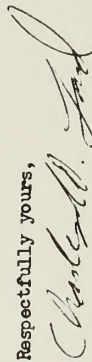
After further studying the figures on the deer in each allotment, I had to disagree on the number of deer reported on the Lone Cedar Allotment in comparison to the allotments next to me. I have hunted and rode this area extensively and know that the deer are quite evenly distributed over each allotment in accordance to the amount of feed and water available on each of these allotments. If there are more deer in one area than another, I believe that it would be the area along the State Canal. In the winter or any other time of the year, there are a lot of deer that feed in the fields below the State Canal and go back into the hills in the day time. I believe in order to be more fair and more accurate, each allotment should have an equal percentage of the deer on the allotments. That is, each allotment, Lone Cedar, Westside, and Swedes Canyon, should have an equal percentage of AUMs taken for deer, supposedly in the area, and not having the Lone Cedar Allotment carrying the bulk of the responsibility for the deer. (I obtained deer figures from Appendix II-1 Table F on pages R-46 - R-53.)

	AUMs Current Forage Production	% of Deer AUMs to Current Forage Production	AUMs of Current Preference	% of Deer AUMs of Current Preference	Deer AUMs shown in the tables	Deer AUMs as they should be on each allotment using current forage production	% of Deer AUMs as they should be to each allot- ment using current forage production
26 Westside	501	17%	839	10%	84	115	23%
Lone Cedar	1278	28%	1310	28%	363	293	23%
Swedes Canyon	505	15%	396	19%	77	116	23%

26

I am looking forward to working with a feasible alternative plan that will still allow me to run livestock effectively and maintain a living for my family. I firmly believe that with fencing, seeding, and water development, coupled with everyone's hard work and endeavor, that the Lone Cedar Allotment can work for the betterment of all concerned, and that the Livestock, Recreation, and Hunting interest can all benefit.

Respectfully yours,



Charles W. Lund
P.O. Box 352
Gunnison, Utah 84634

Responses to Letter 9

9.1 The combination of allotments is only one alternative. In all cases, combinations may not be the best management alternative, although in some cases it is best where allotments are too small to allow for proper distribution and utilization of the area. The combinations would have to be worked out on a case-by-case basis, keeping in mind what would be best for all concerned especially the range resources. See Letter Response 4.1.

9.2 The reasons for the lower licensed use are noted and taken into consideration. The average licensed use record was used for each allotment. It is recognized that in every case this record may not indicate actual use or reasons for stocking levels, as in this example, where numbers are low. However, average use recorded over a period of years can give some indication of the reasons for apparent range condition and trend. The Lone Cedar Allotment appears to be in mostly good condition. This is indicative of past good management and use at near the proper stocking level. The figures used in this DEIS are only a guide as to how to proceed in the future management. As pointed out, the years 1969-1976 are more indicative of the past use. The more accurate situation would probably be between 798 and 993 AUMs. This will be worked out on a case-by-case basis, when the Program Decision Document is developed. Alternative F presents the approximate level you describe. The Program Decision Document could allocate use at that level.

9.3. The reason for two similar allotments having different allocations for deer AUMs is that deer are free roaming animals and often spend more time or in greater numbers in one allotment. For these reasons, it would not be fair and equitable to prorate deer AUMs strictly on a percentage of vegetation production. See Letter Response 4.3.



United States Department of the Interior

WATER AND POWER RESOURCES SERVICE

UPPER COLORADO REGIONAL OFFICE

P.O. BOX 11368

SALT LAKE CITY, UTAH 84147

IN REPLY
REFER TO

UC-150

120.1

Memorandum

JUL 14 1980

To: District Manager, Bureau of Land Management, 150 East
900 North, Richfield, Utah 84701

From: Regional Director
Water and Power Resources Service

Subject: Draft Environmental Statement - Mountain Valley Grazing
Management (DES 80-36)

The Upper Colorado Region has reviewed the above Draft Environmental Statement for the Water and Power Resources Service and finds that none of the alternatives would appear to have any significant direct effects on any of the Service's projects. We suggest, however, that the discussions of water quality impacts be expanded to include the potential for an increase in nutrient loading to reservoirs and lakes receiving tributary inflows from affected drainages.

We appreciate the opportunity to review the Mountain Valley Grazing Management Draft Environmental Statement.

Frank W. Keller

cc: Director, Office of Environmental Project Review, Office of the
Secretary, Department of the Interior, Washington, D. C. 20240
Commissioner, Attention: 150

Response to Letter 10

10.1 The discussion of nutrient loading was not included in the text because the levels of grazing use analyzed in this EIS are not projected to increase nutrient loading of lakes or reservoirs. According to Buckhouse and Gifford (1976), "the potential public health hazard of livestock grazing on semi-arid open range on gentle slopes is minimal."



JUL 7 1980

Ref: 8W-EE

Mr. Donald Pendleton
District Manager
Bureau of Land Management
150 East 900 North
Richfield, Utah 84701

Dear Mr. Pendleton:

We have reviewed the Mountain Valley Grazing Management draft environmental impact statement and have rated it LO-1. This means we have no objections to the proposed action. We support the Bureau of Land Management's efforts to improve rangeland conditions through grazing treatments and cattle grazing reductions.

12.1

One recommendation we offer is that riparian fencing be "rotated" to various stream segments where vegetation condition is on the decline. By rotating fencing as opposed to fencing a single area (such as the six miles proposed in alternative C) it may be possible to improve the overall condition of riparian vegetation and water quality within the management area.

Thank you for the opportunity to comment on this draft statement.

Sincerely yours,

Roger Williams
Roger Williams
Regional Administrator

July 27-80

Bureau of Land Management
I am writing in regards to
Senior River Resource Area grazing.
And the environmental impact statement
My having a few grazing cattle. I
am for continuing grazing permits
for livestock. I would like to
see how we can help the livestock graze
on public lands. helping the public lands
to develop properly. I don't give
livestock a chance to calve on new
land away from disease. I have
never lost a calf on the public lands
due to any form of disease.
And when a ~~land~~ stock man has
his cattle on public lands. He watches
the lands to see if it produces
good feed.

I And the cattle man has a chance to
observe wild life, too reports any
danger's too the wild life.
So I think for the good of the
lands. We ought to continue
live stock grazing on public lands.

Sincerely yours
Robert Lee Olson
Box 86 Margrave
Utah 84750

Response to Letter 12

12.1 See Riparian Vegetation section, Page 4-32. Results from various range studies question whether this type of vegetation can be restored on previously overgrazed pastures by implementing different types of grazing treatments. Armour and Hormay are of the opinion that riparian vegetation will always be closely utilized regardless of the stocking rate or grazing system employed. The only way to improve overgrazed riparian vegetation is to completely and permanently fence the area. Rotating fencing would only protect riparian vegetation for the duration of livestock exclusion.



Utah State University and the U. S.
Department of Agriculture Cooperating

COOPERATIVE EXTENSION SERVICE
UTAH STATE UNIVERSITY

UMC 49
LOGAN, UTAH 84322

July 14, 1980

Mr. Don Pendleton, Dist. Mgr.
Bureau of Land Management
150 East, 900 North
Richfield, UT 84701

Dear Mr. Pendleton:

I appreciate the opportunity to review and comment on the Draft Mountain Valley Grazing Environmental Impact Statement. My comments are intended to be constructive and centered on rangeland resource management issues. Secondly, my concern centers on the welfare of the people most directly dependent on this land resource. It is hoped that the decisions forthcoming will be sensitive to the needs of both the rangeland and the people of the area.

In the EIS it was noted that the scoping process identified local concern over consolidation or combination of allotments. Socio-economic analysis did not address this aspect of the various proposals. What problems are anticipated with allotment combination and what approaches are being considered for overcoming such problems? In some cases, formation of well organized grazing associations may be necessary for affective administration and management of the allotments.

13.1

There is some confusion regarding total AUMs available and deer, cattle, sheep, elk, and antelope AUMs. While it is recognized that diets of the various species differ and overlap in varying degrees, the forage allocation process appears to draw "universal" AUMs from a common pool. This makes it difficult or impossible for reviewers to discern competitive from non-competitive forage and implies that all AUMs are competitive. A more useful approach may be to report this information in a way that interspecific competition can be easily identified and tradeoffs recognized. If this is done, conflicts over competitive forage on public land may be more easily resolved. With sources of forage and cover (private land, public land, National Forest lands) and annual use patterns identified, it should become easier to reach compromises among different interest groups in terms of recognized tradeoffs. For example, large allocations for deer on public land may result in proportionally larger forage bottlenecks for deer on private lands resulting in greatly increased incidence and magnitude of animal damage. Planning for herd increases or decreases for wildlife or livestock should be done on the basis of all the land resources involved to avoid creation of additional habitat or forage bottlenecks.

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13.3 While grazing management objectives and alternatives (treatments) must be identified, formulation of grazing plans on specific units (allotments) should take place with the affected ranchers to attain maximum cooperation and coordination. Rather than proposing various specific grazing treatments, it is preferable to identify specific objectives. There may be ways other than the specific grazing treatment that meet management objectives.

13.4 A 50% or less utilization limitation for key species as is proposed as policy may be an appropriate target in general. However, where species such as crested wheatgrass are performing a specific function in grazing management, such a limitation may be inappropriate. It is widely known and accepted that crested wheatgrass has a unique capability of withstanding relatively high levels of utilization while remaining vigorous and productive (this is also influenced by the site characteristics and season of use). Excessively conservative grazing limitations may greatly reduce the contribution to range management that a particular range seeding is capable of providing.

13.5 Procedural or policy decisions on deferment after vegetation modification appear to be excessively rigid. The general guidelines of deferment for two growing seasons or two years may be appropriate in most cases, however such guidelines should not overshadow the objectives noted in the policy statement, "...[deferment] until vegetation becomes well established and capable of supporting [withstanding] livestock grazing" (a sufficient operational policy description). Research in Wyoming (Smith, 1969; JRM 22:4) indicates that in some instances deferment may be unnecessary following sagebrush spraying. If deferment is indeed unnecessary on a particular area, needless costs are associated with the project by deferment. Deferment prescription determinations should be made on the site based on available information and the previously stated deferment objectives, not a policy formula

13.6 Additional vegetation modification on suitable sites should be proposed regardless of the alternatives if widespread improvement if the rangeland resources situation as described is to be expected. Waiting for herbivore use (or lack of it) to change closed communities of sagebrush or pinyon-juniper is a very long term proposition and may never attain the desired results. In addition to increased vegetation modification activities, increased Christmas tree or wood cutting and reduced fire suppression/increased rehabilitation of burns are two directional changes in policy that can contribute to a more rapid improvement in the rangeland resource situation. Such policy changes would require additional efforts in planning and administration to achieve the desired results. Generally, in areas dominated by woody species, more emphasis needs to be placed on management of the plant communities by whatever means available and less emphasis should be placed on manipulation of grazing as a management tool.

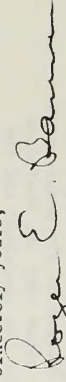
13.7 Contrary to the interpretation of his research that appears in the environmental consequences section of this document, Crocker-Bedford (1976) concluded that "Within any one year, cattle probably rarely reduce popula-

13.7 tions of Utah prairie dogs, and possibly may increase populations in colonies with high primary production". According to this researcher, the danger of detrimental cattle grazing occurs under heavy grazing over time, a situation that induces changes in the plant communities to shrubs. Under the levels of management and use proposed in this document, with the exception of Alternative E, there appears to be little likelihood of such an occurrence. Also based on Crocker-Bedford's conclusions, fencing of existing or prairie dog transplant sites is unnecessary.

13.8 Increases in livestock use under alternatives such as Alternative C are dependent on increased availability of forage which is subject to limitations on level of use. It does not seem logical that there would be an increase in livestock competition with sagegrouse and a subsequent detrimental impact as is portrayed in the environmental consequences section. Where vegetation modification is proposed and where seeding is necessary, by policy, design restrictions specify protection of critical wildlife areas and seeding of plant species preferred by wildlife as well as livestock. This could be interpreted as a positive impact on sagegrouse. Additional water development and associated wet areas caused by tank overflow should not only provide needed water for sagegrouse but also succulent vegetation. Although BLM policy for design of range improvement practices is to protect, if not enhance resource values such as wildlife habitat, the assumption for analysis of environmental consequences of proposals appears to ignore this policy. If analyses had been made with the existing multiple-use based procedures assumed, there would be much less negative impacts to various resource values. Many of the adverse impacts of activities considered could be mitigated and result in enhancement of other resource values through proper design.

Again, I appreciate the opportunity to review and comment on this draft.

Sincerely yours,


Roger E. Banner,
Extension Range Specialist

REB:pjn

cc: Merrill DeSpain

Responses to Letter 13

13.1 The economic impacts of allotment combinations were not specifically addressed in this EIS because data regarding these impacts are not available and the economic analysis is not taken to the level of individual allotments or combinations thereof. While some economic impacts due to allotment combinations may occur to individual ranchers, the economic analysis is too general to cover that impact. Page 4-23 addresses other impacts that would result from allotment combinations. Alternatives E and F were proposed without allotment combinations. The EIS also addresses attitudes and expectations (Page 3-59) regarding the perceived negative factors associated with outside management control of allotments when any reduction or change in use is suggested. For a discussion of anticipated problems associated with allotment combinations see Letters 4 and 9 and their responses. The alternatives shown allow for analysis and development of the "best way" to manage the resources. In some cases, allotment combinations may not be the best way. Formulation of grazing associations is still provided for in BLM policy and regulations and can be of real service in management of the public lands.

13.2 The allocation of forage was computed allotment by allotment and based on plant species composition, season of use, and dietary preference of the animals involved. To the degree that available data would allow, no animal was allocated forage that it could not utilize. According to the data and formulas used in forage allocation, there are very few noncompetitive AUMs in the planning area. A typical example of this would be Angle Bench Allotment where the conversion ratio, based on season of use and competition for key browse species, would be 1 cow AUM for each 0.5 deer AUM. This would be a very inefficient conversion, but all 543 AUMs of forage production could be allocated to deer on this basis if there were the need. If 271 AUMs of the 543 AUMs were allocated to deer, it would preclude any allocation to cattle.

Historically, especially in the Mountain Valley Planning Area, much of the overuse (depredation) of private lands by big game has been caused by overuse of forage by livestock and big game on public lands. This is especially true on critical deer wintering areas where the kind of livestock and season of use may have caused competition and overuse. This situation is not desirable on public, National Forest, or private lands and the problem is not an easy one to resolve. However, if more forage is available on public lands, there would be less displacement and less reason for big game to move onto lower, predominantly private lands. In situations where private rangelands are interspersed with public lands, the problem is more complex.

13.3 Note that while grazing treatments have been identified, it is realized that the formulation of specific grazing plans should be developed in cooperation with the affected livestock operators. The objectives developed during planning were used in the formulation of grazing treatments identified in Appendix II-1. Grazing treatments should not be confused with grazing systems. Grazing systems incorporating these treatments would be described in the individual AMPs that would be prepared following decisions made in the Program Decision Document by the District Manager after completion of this EIS and the MFP, Step 3. Those systems would further define the treatments proposed in the DEIS and would follow specific objectives developed for each AMP and provide more detail regarding on-the-ground management.

13.4 Studies by Reynolds and Springfield (1953) concluded that utilization of crested wheatgrass should not exceed 45 percent by weight each year for greatest sustained returns in total herbage. However, other studies do show that crested wheatgrass production can be maintained under 65 to 70 percent utilization by cattle during the spring period (Springfield, 1963; Springfield and Feid, 1967; Frischknecht and Harris, 1968).

The seedlings in the Mountain Valley Planning Area (existing and planned) are not monotypic stands of crested wheatgrass but are mixtures of grass and browse species. If utilization of crested wheatgrass is allowed to go beyond 50 percent, the utilization of other plants on and off the seedling would exceed 50 percent. This would cause more palatable species such as native Indian ricegrass to be overutilized which could hamper improvement or maintenance of range condition.

13.5 It is agreed that in some instances, deferment may not be necessary for two growing seasons if vegetation becomes well established and becomes capable of supporting some livestock grazing. In these cases, flexibility is provided for in the policy that would permit grazing before the 2 year's rest indicated on Page 2-23.

13.6 During the planning phase in the development of the Mountain Valley EIS, all possible areas suitable for some type of vegetation modification were considered. During later scoping and analysis, efforts were made to see that no suitable areas were overlooked; also, a few areas were added. The reason that the amount of vegetation modification differs from one alternative to another is to illustrate to management the range of possibilities that can be considered. With the information supplied in the EIS, management can look at need versus cost and benefit.

Christmas tree, fence post, and firewood cutting are used to manage closed stands of pinyon-juniper in this planning area. The areas are usually designated and permits are required.

The analysis (Chapter 4, Vegetation) does not predict any improvement in closed pinyon-juniper or sagebrush communities, without some method of vegetation modification. It is agreed that grazing management alone could not be used to improve areas dominated by woody species within a reasonable time period.



STATE OF UTAH
OFFICE OF THE GOVERNOR
SALT LAKE CITY

SCOTT M. MATHESON
GOVERNOR

84114

13.7 See Text Revision section, Page R-141 for additional sources of information which were used in the analysis process but were not included in the DEIS for documentation.

From that data it was concluded that: Grazing by cattle in a season of use which is detrimental to cool season grasses would, in the long term, be detrimental to the Utah prairie dog. Key (critical) period for availability of cool season vegetation (for prairie dogs) is between early April to late June, at the end of lactation (approximately June 25). The dogs begin to range further from their home burrow to find succulent forage. (Crocker-Bedford, personal communication, 1978). Besides the above, Crocker-Bedford also stated that swales or meadows adjacent to the core of a colony are essential for survival in drought periods. In the 1976 research, he concluded that, "Heavy grazing by livestock in the past appears to have eliminated much Utah prairie dog habitat, swales have been destroyed and early spring forage has been reduced." The analysis of the vegetation of the areas where this endangered species is found shows that spring livestock use has the potential for adversely affecting the Utah prairie dog directly through vegetation removal and indirectly through long-term changes in the vegetation composition.

Fencing is unnecessary if there is no direct cattle-prairie dog competition at a given point in time. If there is no other way to eliminate this direct competition, then fencing would seem to be a viable mitigation measure.

13.8 The sagegrouse situation as described in the DEIS (see Page 3-22 and figure 2-6 for a description of the sagegrouse situation) (see Appendix II-1, Table C for what is being proposed in the Cedar Grove and Fish Lake Allotments) shows that the Cedar Grove Allotment is where the majority of sagegrouse use occurs and where the only strutting ground on public land is located. That allotment would continue to have a conflicting season of use for livestock and sagegrouse. Initially, increases in cattle use by 214 AUMs and sheep use by 602 AUMs are the major concern for sagegrouse.

Mr. Gary Wicks, Director
State BLM Office
136 East South Temple
Salt Lake City, Utah 84111

Dear Gary,

Thank you for this opportunity to comment on the BLM's Mountain Valley Grazing Draft EIS. I realize the difficulty in developing a management strategy that is beneficial to the two competing uses in the area, wildlife and livestock grazing. In order to achieve a workable and successful rangeland management program, coordination and communication between the BLM and the ranchers are required. Therefore, I am pleased that the draft EIS refers to the BLM/rancher consultation process required by Section 8 of the Public Rangeland Improvement Act of 1978. I am also pleased that an ongoing monitoring process will be used. These two processes are the key to establishing coordination and communication. However, the final EIS should elaborate further as to what the rancher's responsibilities and involvement are under the two processes. Through implementation of these two processes, I am confident that BLM can achieve a workable and successful range management program.

I hope these comments and the attached state analysis are useful in your decision-making process for rangeland management of the Mountain Valley area.

Sincerely,

Scott M. Matheson
Governor

pj
Attachment

STATE OF UTAH COMMENTS
DRAFT MOUNTAIN VALLEY GRAZING MANAGEMENT
ENVIRONMENTAL IMPACT STATEMENT

July 25, 1980

We appreciate the opportunity to review and comment on the Draft Mountain Valley Grazing Environmental Impact Statement. We appreciate the fact that historically, this area has been important to local ranchers for grazing purposes while supporting substantial numbers of big game--primarily deer. These two competing uses have caused problems in the administration of these rangelands, and we realize the difficulty of trying to strike a compromise in resource allocations between these two important uses.

In the environmental statement, it is noted that the scoping process identified local concerns over the combination of allotments. The socio-economic analysis does not adequately address these concerns and should be addressed in more detail in the final environmental statement. Such questions as what problems might be anticipated when various allotments are combined and what approaches are being considered or should be considered should be identified to alleviate some of these concerns.

We do not advocate the single purpose intent of some of the alternatives being proposed (such as Alternative D) because properly managed livestock and wildlife can coexist on public rangelands often to the mutual benefit of both livestock and wildlife.

The document does not adequately address non-game wildlife. It should be noted somewhere that numerous non-game mammals, birds, reptiles, and amphibians inhabit the study area and are important in the overall ecosystem. Historically, this area has also supported and been important for sage grouse. Today, only remnant populations exist of this species. More consideration

14.3

needs to be given concerning the impact of the various proposals on the sage grouse in the area.

On Page 2-1 there is a discussion concerning vegetation allocation.

There is some confusion regarding how the total AUM's were allocated among livestock and wildlife species. This makes it difficult to discern competitive from non-competitive forage and what forage and species were allocated to the various uses. The environmental statement should clearly show the allocation of competitive and non-competitive forage among the various classes of grazers, both in terms of species and quantity, to help alleviate this confusion.

Also on this page, it talks about a fifty percent or less utilization limitation for key species. This policy may be an appropriate target in general; however, it should be kept in mind that there are species and circumstances where a greater-than-fifty-percent utilization would be appropriate and desirable and would not lead to a deterioration of range condition. Therefore, as a general policy, the fifty percent rule on key species needs flexibility that can be taken into consideration on an allotment-by-allotment basis as the allotment management plans and grazing systems are worked out with the individual permittee.

Under the various alternatives, differing miles of pipeline is proposed for water development. As it relates to these water developments, there should be discussion of the impact of these water developments on wildlife and how the proposed water developments can be modified to provide for wildlife use.

Page 2-6 discusses the six different proposed grazing treatments. Under the various proposed treatments, there needs to be a better discussion of riparian areas. It is proposed that several miles of fence be installed along streams in some allotments to protect some of the stream areas. This

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may not be the best solution for management and protection of these riparian areas. The options should be opened for each allotment so the specific riparian areas of concern can be discussed and handled as the local conditions dictate. One of the questions that arise concerning fencing the streams is access for livestock and wildlife watering purposes. Would water sources be provided outside of the fenced stream sections for both livestock and wildlife purposes? If riparian areas are fenced, studies should be initiated to monitor the effects of fencing. It would be desirable to provide for some grazing in these riparian areas in the future and not leave them permanently fenced off from the rest of the allotment.

14.8

Under the various proposed alternatives, different mixes of grazing treatment are discussed for various allotments. We hope that these alternatives are flexible enough to develop--with the help of the individual permittee on each allotment--the best grazing system to meet the objectives for that particular allotment and not be locked into some pre-set grazing treatment that would not meet the objectives needed for the particular allotment under question.

14.9

The statement is made on Page 2-1 that the total vegetation production in the Mountain Valley area is unknown, yet it is stated that the usable vegetation is known as determined by the range surveys and evaluations. This seems somewhat inconsistent. The surveys are only an estimate of the vegetation available for allocation to both livestock and wildlife. They should only serve as a starting point and not be interpreted as an exact carrying capacity for any allotment. The surveys are not that accurate and the confidence or reliability of the surveys need to be taken into consideration and should be discussed in the document.

34

On Page 2-20 we were pleased to see a discussion concerning rancher/BLM consultation. We believe this section could be strengthened, however, by further elaborating upon what the consultation process would involve as the rancher and the BLM meets to develop the allotment management plan.

14.10

On this same page the monitoring program is discussed. This program, along with the consultation portion, are the two key elements to a successful range management program. It should be emphasized what the rancher involvement and responsibilities will be under the monitoring program. The rancher needs to be involved so he understands the procedures being used and the interpretation of the data being collected.

14.11

We were pleased to see many acres of range improvement projects being proposed. However, additional vegetation modification on suitable sites should be identified. There are many areas within the Mountain Valley Planning Area that will not improve substantially--if any--by simply adjusting livestock numbers. In those plant communities that consist essentially of closed stands of sagebrush or pinyon/juniper, some vegetative manipulation is needed before these plant communities will show any substantial increase in production of more desirable forage plants.

14.12

Responses to Letter 14

14.1 See Letter Response 13.1.

14.2 It is recognized that nongame animals are important elements of the ecosystem. However, the objective of the environmental impact statement is to address those environmental elements significantly affected by the proposals. None of the proposals would significantly impact nongame animals. Therefore, they were not and should not be addressed in the statement.

14.3 See Page 1-12; Page 2-5 No. 7; Page 2-20 Monitoring Program; Page 2-22 Standard Design, Construction and Operation Features (especially No. 7, 10, and 13); Page 2-25 Table 2-4 No. 5; Page 2-26, Plowing or Contour Farrowing and Seeding No. 2; Page 2-26 Water Developments No. 6, 7 and 9; Page 3-22 Sagegrouse; and the sagegrouse sections in all alternatives. The consideration given sagegrouse in these sections adequately analyzes the impacts to sagegrouse.

14.4 See Letter Responses 9.2 and 13.2.

14.5 See Letter Response 13.4.

14.6 See Letter Responses 13.8 and 14.3.

14.7 The monitoring program proposed on Pages 2-20 and 21 would commence with a detailed inventory of the existing riparian vegetation. Data from the monitoring program would be evaluated to determine management effectiveness and to assist in making necessary adjustments. Then a decision would be made on a case-by-case basis as to how these areas would be protected.

14.8 See Text Revision section, Page 2-6.

14.9 Refer to Letter Response 12.1; however, data collected from the proposed monitoring program, Page 2-20, will be used to evaluate the effects of fencing, and to determine if grazing should be allowed in certain riparian areas in the future.

14.10 See Letter Response 13.2. The intent here is to develop programs cooperatively.

14.11 The rancher involvement and respectability is no different under this suggested monitoring program than it has been since range monitoring and studies began in BLM. Ranchers have given actual use records and BLM has verified that data. Permittees are and should be invited to attend utilization checks. They should consult with BLM on climate information (drought) and good years, and know where the precipitation gages are and how they provide data. The rancher needs to be involved and will continue to be involved in helping to solve problems on the allotments.

14.12 See Letter Response 13.6.



United States
Department of
Agriculture

Soil
Conservation
Service

4012 Federal Building
125 South State Street
Salt Lake City, UT 84138

July 17, 1980

District Manager
Bureau of Land Management
150 E. 900 N.
Richfield, UT 84701

Dear Sir:

We have reviewed the Draft Mountain Valley Grazing Management Environmental Impact Statement. Most of the areas of concern where the Soil Conservation Service has interest or expertise have been adequately addressed. We offer the following comments for your consideration in preparing the final Environmental Impact Statement:

1. In the introduction to Chapter 4, assumption 3 states, "It is assumed that impacts on state and private lands would be similar to those identified for public lands." If alternatives A or D were implemented, livestock grazing pressure would increase on private and state lands. These areas would also receive increased grazing pressure from game animals. The result would be overuse of the private and state grazing resources and an overall decline in range condition. Such a decline would result in increased antagonism toward game use of private land. Loss of 1/4 of the antelope range, 1/3 of the critical deer winter range and 3/4 of the critical elk winter range would become a very real possibility.

2. On page 3-13, the statement about mule deer critical range being on public lands is misleading. Figure 3-4 is compared with figure 1-1. It appears that about 1/3 of the mule deer concentration areas are on non-federal land.

3. The write-up on pages 3-16 and 3-17 should mention the fact that most (probably 75 percent) of the elk use and 25 percent of the antelope use in the planning area is on private and state lands.

4. The discussion on endangered species should point out that 17 of the 18 identified bald eagle areas and 5 of the 9 identified sagegrouse strutting areas are on private land.

5. The impact statement indicates a long term adverse impact to sagegrouse if alternatives C or F are implemented. If the vegetation modification projects are implemented properly, an increase rather than a decline in sagegrouse population could result.



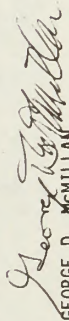
District Manager

Page 2

6. The title of table 3-1 is misleading. Only one of the plants here has actually been listed as threatened. The others are proposed and should be so designated.

We appreciate the opportunity to review and comment on this Draft Environmental Impact Statement.

Sincerely,


GEORGE D. McMILLAN
State Conservationist

cc:
Gary Margheim, Environmental Coordinator, SCS, Washington DC
Verle Smith, AC, SCS, Richfield, UT
Mark Petersen, RC, SCS, Salt Lake City, UT

Responses to Letter 15

- 15.1 On Page 4-1, Basic Assumption No. 3 should help clarify this statement. Forest, State, and private lands help provide for Utah's wildlife but this EIS analyzes the impacts only to BLM-administered lands. See Text Revision section, Page 3-13.
- 15.2 See response 1 to this same letter. Review Figures 1-1 and 3-5 to see that very little of the elk and antelope occupied areas are on private land.
- 15.3 See Figure 3.6 on Pages 3-20 and 3-21 for the information suggested.
- 15.4 The key to the sagegrouse impact is the proposed season of use of live-stock, not vegetation modification projects. Please see Page 4-56 and Letter Response 13.8.
- 15.5 At the time the EIS was written, plants that were candidate or proposed were referred to as "threatened and endangered plants" collectively. It is presently Utah State BLM Policy (July 29, 1980) to refer only to officially listed plants as endangered or threatened and to all others as sensitive. See Text Revision section, Page 3-5.

Mayfield, Utah 84643
July 18, 1980

District Manager
Bureau of Land Management
150 East 900 North, P.O. Box 768
Richfield, Utah 84701

Dear Mr. Pendleton:

I am writing in regards to the DEIS for the Mountain Valley Grazing Management. My comments will relate primarily to the areas near Mayfield, with which I am well acquainted, since I have lived here my entire life.

I am concerned about some errors I note immediately, such as the maps which show the land south and east of Mayfield being private all the way to the forest boundary. The major part of this land is State land which has been chained and reseeded.

In my opinion there are inaccuracies in the reported numbers of elk on North Hollow, Middle Hollow, and South Hollow. For the 20 years prior to 1977 I traveled at least once a week from Nov. to mid-April through the South Hollow Allotment to the mouth of Pole Canyon. During this time I never ever saw an elk and only once saw elk tracks. They were at the mouth of Pole Canyon on State land. There have been a few elk on the south side of this allotment for a few months during the past two winters. Rarely does an elk get on the Middle Hollow Allotment and I doubt a hand full of elk pellets could be found on the entire North Hollow Allotment.

I do not believe there is sufficient data to evaluate these recently reseeded areas. Appendix I-1 A shows the South Hollow Allotment as being fair or good, yet the entire 2,096 acres as declining. Only about half of this unit has been reseeded and is utilized by cattle. If the other half is declining, then grazing by cattle cannot be the cause. I see no effective way to regulate the numbers of deer and elk under the present management system.

I have always been in favor of the multiple use concept of our public lands and I still am, but I feel that the cattle have been out excessively. I personally spent 2 days on the South Hollow Allotment when the cattle were taken off this July, and utilization was approximately 50%, with the present number of AUMs. This does not warrant a 50% cut in AUMs. There is a minor distribution problem and a need to utilize the south side more and the north side less. Possible solutions are salt and water distribution as well as fencing.

I note no consideration for management of the Chukar Partridge Populations on any of the Mountain Valley Unit. I believe an effort should be made to include their management in the DEIS for this unit. Considerations should be made for water storage where possible and ramps or other protective devices on the watering troughs to prevent drowning of Chukars.

Thank you for considering my comments. They represent my own opinions and I am not commenting as a representative of Snow College.

Sincerely yours,
Arthur M. Hansen
Arthur M. Hansen, Prof.
Dept. of Biology Snow College

Responses to Letter 16

16.1 Much of the land south and east of Mayfield belongs to the State. However, this land was purchased by the Utah Division of Wildlife Resources and does not belong in the same category as the State School Lands, nor is the distinction customarily made on land status maps. The land status map in this EIS does not segregate private lands from UDMR lands.

16.2 BLM studies have shown that there has been elk use in these areas in the past, there is elk use now, and use is likely to expand in the future. Data collected in 1979-80 indicates there are 74 AUMs of elk use in the South Hollow Allotment. Because elk are mobile (free roaming) they may spend more or less time in one allotment in any given year. It is therefore necessary to attempt to predict use in adjoining allotments, within a normal use area, to prevent over-obligation of the basic vegetation resource. See also Letter Response 4.3.

16.3 Declining trend can be caused by a number of factors other than livestock; drought, overuse by big game, and insects or rabbits can cause or contribute to causing such a situation. It is also possible that the trend was measured in an area of heavier use than is representative of the whole allotment. However, when trend in range condition is measured, it should be measured in an area that is customarily used by livestock. Otherwise, the response of vegetation to livestock use cannot be measured.

16.4 According to utilization studies conducted in July 1980 by the BLM on South Hollow Allotment, utilization of key species averaged 49 percent with an actual use of 283 AUMs out of 292 preference. In the past, distribution of livestock on this allotment has caused overutilization of certain areas. Recently, improved water and salt placement has improved distribution and lowered utilization on previously hard hit areas, while allowing use in previously unused areas. The additional information on actual use, utilization, and change in condition will be taken into account when the decision is made.

16.5 Even though chukar partridge are found in the Mountain Valley Planning Area, their numbers are small and the populations scattered. Since the purpose of this DEIS is to analyze the impacts of livestock grazing on all other resources, the impacts of grazing on them was not considered to be an issue. However, management for chukar partridge habitat is part of the ongoing program.

Page 2-23 No. 9 and 10 and Page 2-26 and 27, under Water Developments, all have provisions that insure that wildlife are provided safe sources of drinking water.

July 19, 1980

To Whom It May Concern:

In response to a letter from the B.L.M. we are making a written response to the E.I.S. prepared for the Mountain Valley Planning Area.

We have a 292 A.U.M. allotment in the north central part of the planning area, about five miles south of Mayfield. It is designated in the study as South Hollow.

Our allotment is presently being used under a multiple-use philosophy, with grazing and hunting being the major uses. We feel and have always felt that public land can best be utilized by proper use from all parties interested. Our allotment is of significant economic importance to us, just as most allotments in this planning area are to their livestock users.

We have several major concerns that we feel should be considered in your final evaluations and plans:

- (1) We feel that the allotment must be used by multiple interests. We are firmly opposed to exclusive use of the allotment by any one group.
- (2) It is our opinion that the proposed livestock grazing reductions of approximately 54 per cent under Alternatives C and F, which seem to be the options under greatest consideration, are too severe. On page R-6 of the E.I.S. it lists the current A.U.M. production as 313 A.U.M.'s.

17.1

This seems rather low to us because the average licensed use has been 266 A.U.M.'s with large areas to the south and east of the allotment that have not been adequately grazed in the past years prior to our acquisition of the grazing permit. It seems quite likely to us that there are more than 47 A.U.M.'s of forage production on these areas.

(3)

We feel that our experience with the cattle this past spring indicates the need for a drift fence more than a 54 per cent cut in livestock grazing. The allotment has a peculiar arrangement in that the most accessible feed, flat terrain, and water from a pipeline are both on the extreme north end of the allotment. We tried to control the grazing of this part of the allotment by hauling water to other parts of the allotment, by salting away from the north end and by driving the cattle away from the north end many times. With these efforts we reduced the use on the north end of the allotment by 10 per cent according to the B.L.M. Range Specialist, but we could not stop the cattle from drifting back to the north every two to four days. Even with the drastic reduction in allocated A.U.M.'s this problem will still exist, an over-use of the north end will continue.

(4)

All 2,096 acres are listed as declining. This does not seem accurate because of the large tracts that received little or no grazing by the permittee who held the grazing rights during the time of the study outlined in the E.I.S.

(5)

We read in the E.I.S. that the reduction in livestock use will be accompanied by a reduction in use by deer. We

17.3

would be disappointed to see a cut in cattle use without this accompanying cut in wildlife use. During the past few years a similar situation occurred on the National Forest, but they were unable to gain the support of the Fish and Game so the actual use of the range has increased because there are one or two elk replacements for the cattle that were taken off the allotment. Can the B.L.M. really cause a reduction in deer use?

Our proposal would differ slightly from those outlined in the E.I.S. because we feel our allotment, South Hollow, has more of a management problem than a forage problem. Our proposals are as follows:

- (1) A fence should be constructed to control the over-use of the north part of the allotment, which would also provide more equal distribution of the livestock during the grazing period and better utilization of the areas not currently being used enough. This would also allow the north part of the allotment to be grazed after the grass reaches a more mature state.
- (2) A pipeline should be installed to provide water to a more central site in the allotment to decrease pressure on the north end. A fence could also be built on the very south end of the allotment to provide access to Willow Creek for even better water distribution.
- (3) We would consider a 10 or even 20 per cent non-use in conjunction with Proposals 1 and 2 for two or three years to see if that will not be sufficient to improve the status of the range, rather than the permanent reduction of 52 per cent of the A.U.M.'s under Alternative C or 33 per cent under Alternative F.

17.5

- (4) There are several pinion and cedar ridges on the east side of the allotment that have no forage value for either livestock or wildlife. They could be railed and seeded with great benefit to the allotment.

We reaffirm our commitment to multiple-use of the land. We have cooperated with the B.L.M. during the two years we have grazed South Hollow and we will continue to do so.

Sincerely,

Gayle G. Hansen

Grant R. Hansen

Gayle G. Hansen
Grant R. Hansen
Arapahoe Simmental Ranch
116 East 200 South
Mayfield, Utah 84645

528-7784 or
528-3582

Responses to Letter 17

17.1 The data from key areas show declining trend on South Hollow Allotment. See Letter Response 16.4.

17.2 The South Hollow Allotment has been intensively studied during 1979 and 1980. After spring grazing (1980), it appears that the level of stocking is about right but distribution of livestock in the past has been poor. The need to construct a short division fence so that cattle can be controlled is recognized. The fencing is provided for in Alternatives B, C, and F. The recent monitoring and evaluation work also shows that survey capacity is probably low and the stocking would need to be adjusted as described on Page 2-21. As allotment management plans are developed, this more recent data will be taken into account for the decision.

17.3 Refer to Letter Response 16.3.

17.4 The BLM by itself cannot cause a reduction in deer use. However, BLM can make recommendations for reductions to the Interagency Committee (UDWR, BLM, and USFS) who in turn makes a recommendation to the Utah Board of Big Game Control. When such recommendations are backed by sound biological data and the need for the reduction is justifiable, such recommendations usually result in deer reduction programs.

17.5 Refer to Appendix II-1, Tables A, B, C, and F. Fences and water developments have been proposed in the South Hollow Allotment. The exact location and final plans would be worked out between the permittees and BLM range managers when the management plan was developed.

July 21 1980

Dear Sir,

I'm studying the Mt Valley Grazing Management E.I.S. I have found an area to be considered -

I am a water user & stock holder in the Canal Co. Each of the Alternatives have said water flow back to the streams would be reduced. But the quality would be better. As a user of spring water run off into the streams River & Reservoir's we are ~~concerned~~ concerned and need this water as our Summer gets hot & dry.

We also feel the cattle men and sheep Range have not been over done to hurt these Ranges

there has been plenty and with your help have increased to a great extent the ~~the~~ U.M.'s.

We feel there should be no more Cuts But Rotate as you have had them do.

Deer & Antelope don't compete very much on the Grasses that our cattle & sheep eat. So as a Farmer and stock man we feel there is plenty for both.

Don't sell us short of our ranges! We need them & our water is the life blood of our land. Thank you

Garth Ogden

Shewier County Farm Bureau

18.1 Grazing studies in Colorado, South Dakota, and Arizona have shown that runoff from summer rainfall increases with higher grazing intensity while runoff from winter and spring precipitation is less influenced by the amount of perennial grass vegetation (Branson et al., 1978, Rangeland Hydrology, SRM, Denver, Colorado). Since most of the runoff in the Mountain Valley Planning Area (more than 70 percent) is derived from winter precipitation (as snow melt), the reduced runoff caused by instituting grazing systems and reducing livestock numbers would be a relatively slight loss. Reduction of summer storm runoff resulting from increased vegetation cover and improved range condition cannot be predicted with available data.

Willden Farms
310 E. Canyon Rd.
Mayfield, Ut. 84643

Bureau Of Land Management:

Having never seen or knowing little of the other areas affected by this Environmental Impact Statement the only comments I can make are in its relation to our Middle Hollow allotment.

To begin with the entire statement is based on a range survey that is neither accurate or just. In the past I've made many verbal complaints regarding the placement of the survey. In the early 70's a trough was installed south of the stake and the cattle continuously travel to water through the survey area. If it had been placed 100-200 yards farther up the face of the hill the affect would not be as great.

The surveyonly covers a small area of plant types to assume all 764 acres of native grass, seeding, cedar, browse and sage brush are declining seems rather presumptuous. How can 256 acres of Cedar and browse be declining when they have never been improved, and you have no survey of these areas?

The allotment is on very broken ground with some areas partially isolated by ridges, gullies, canyons etc and some areas are naturally used more, the survey site in particular. To assume 764 acres are declining because three acres are declining is not sound reasoning.

The survey was completed, at least in regards to the Impact Statement, following two years of drought, one of which was the worst on record. How can you have two drought years and expect it to have no effect on the range conditions?

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As far as the alternatives are concerned-

- A. Doesn't generate any income and is bad for the livestock industry and from what is happening down south on the Hot Desert is perhaps illegal.
- B. Doesn't allow for Multiple Use- Public lands should not be reserved for one group of people environmentalists, or cattlemen etc.
- C. Is unacceptable only because the survey completed is not a true indicator of the range condition.
- D. Reserves public lands for the sportsman. In the long run it might be the best thing you could do to us, cattle men, "shoot us" and put an end to our suffering through a system that can change with each administration or current whim of the lobbyists and people who have never been here and will never be here.
- E. Would be acceptable until a better survey can be made.
- F. Is the most desirable to us

I don't know why you bother with all this paper work. My opinion on the placement of the survey was a waste of breath and the time just spent on this. All in all you'll do as you please any way.

Middle Hollow Allotment

G. Douglas Willden

G. Douglas Willden

Responses to Letter 19

19.1 Because of comments made during scoping, Alternative F was developed. This alternative does not use the range survey capacity as a basis for determination of forage production, but uses range trend and condition. For example, if the survey says that a range is overstocked, but range condition is good and trend is static, then it puts the validity of the range survey capacity in question. The trend plot stake you refer to may be within an area the cows use to trail to water, but as this area is also counted upon to provide vegetation, the use it reflects is important to record. If range condition continues to decline in a widening radius around the water trough, this would indicate some kind of adjustment in stocking, distribution, season of use, or watering facilities is needed.

19.2 Refer to Letter Response 16.3.

The terms improving, static, and declining refer to change in range condition (see Appendix III-2, Page R-83) not to whether pinyon-juniper or sagebrush has been "improved" by chaining and seeding, etc. The trend is based on a comparison of the sites now with conditions recorded at a previous time on the site.

19.3 The range survey may have been taken during or after a drought, and the range condition and trend may be the result of drought. Much range degradation has come about because of carrying capacities that were based on a series of exceptional years. However, this problem is the reason for monitoring the range in years following the survey (see Page 2-20 and 21). Carrying capacities would be adjusted to overcome deficiencies resulting from the surveys.



United States Department of the Interior

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FISH AND WILDLIFE SERVICE
AREA OFFICE, COLORADO-UTAH
1311 FEDERAL BUILDING
125 SOUTH STATE STREET
SALT LAKE CITY, UTAH 84138

IN REPLY REFER TO

(ES)

July 18, 1980

MEMORANDUM

TO: Donald L. Pendleton, District Manager
Bureau of Land Management
150 East 900 North
Richfield, Utah 84701

FROM: Robert Shields, Area Manager
Fish and Wildlife Service
Salt Lake City, Utah

SUBJECT: Review Comments on the draft Mountain Valley Grazing Management environmental impact statement

My staff has reviewed the draft environmental statement for the proposed Mountain Valley grazing management program and offer you these comments and recommendations for your consideration. We agree that out of the six proposals, Alternatives A, B, D and E should not be accepted because they would not implement a multiple use management program for forage available for grazing animals. It is our opinion Alternative C (preferred alternative) or Alternative F (a slight variation of Alternative C) are only paper exercises toward complying with the Federal Land Policy and Management Act of 1976 and the Federal Court decision resulting from the suit filed by Natural Resources Defense Council, et. al. Implementation of the preferred alternative would not appreciably improve conditions for elk (page 4-57), antelope (page 4-56), or endangered Utah prairie dogs (pages 4-56 and 4-57); would adversely impact sage grouse (pages 4-56 and 4-57), fish (page 4-57), aquatic habitats (pages 4-54 and 4-55) and riparian habitats (pages 4-50 and 4-53); and would be questionable whether stated improvements in deer habitat would occur (pages 4-55, 4-56 and 4-57) while the livestock grazing would be increased 25 percent over the current allocations (page 4-58). This in our opinion is not multiple use planning.

The planning process leading to this draft statement failed to recognize Executive Order 11990, Protection of Wetlands and the Bureau of Land Management's Wetland-Riparian Area Protection and Management; Policy and Protection Procedures; Final Guidelines (Federal Register, Vol. 45, No. 25, 7889-7895). These guidelines became effective October 1, 1979 and are intended to improve the protection and management of wetlands and riparian areas on BLM - administered lands. Riparian habitat only amounts to less than one tenth of one percent in the Mountain Valley planning area but have a disproportionately high value for fish and wildlife in relationship to the amount available. Good quality riparian areas improves aquatic habitats by improving water quality by limiting dissolved and suspended solids and sedimentation; lowers stream water

Page 2

temperatures; reduces erosion of streambanks; allows development of stream profiles to improve fish habitat and would contribute to better fish populations for increased fisherman use. Present data indicates only total exclusion of livestock, especially cattle, is the only means to restore and maintain a healthy riparian habitat and its associated aquatic habitat. Even short term trespass reverses several years improvement made by excluding livestock (Duff, 1978). Alternative C proposes to fence only 6 miles (73 acres) to exclude livestock out of the 40 miles (488 acres) of this important stream and riparian habitat types while the remaining 85 percent would be allowed to continue to deteriorate.

We believe the riparian-wetland-aquatic habitat should be protected according to Executive Order 11990 and BLM guidelines for doing it. The costs of excluding livestock from riparian-aquatic habitat, including costs of providing off site water for livestock, and the loss of livestock AUMs is justified by improvements in the other resources values that would occur.

Specific Comments

Page 1-5 to 1-7, Table 1-1. Rangeland objectives. We have a number of comments on this table which we believe leads the reader to a wrong conclusion, or if the objective would be met, cannot be predicted based on the information given in this draft document.

Objective 1, fifth sentence states, "Improve the condition of 8,360 acres of big game winter range on the Gunnison Valley, Gypsum, North Narrows and South Narrows Allotments". From the information given in the text, Appendix I-1, Table A, and Appendix II-1, Table C there is no way to judge the probability that this objective could be achieved. Presently the current season of use could cause severe competition between big game and livestock, i.e. Gunnison Valley - Sheep 10/1-10/15; Gypsum - sheep 11/1-5/31; North Narrows - cattle 12/1-5/31 and sheep 2/6-3/31; and South Narrows - cattle 12/1-3/10 and sheep 1/16-3/31. Projected management and developments in Appendix II-1, Table C shows grazing treatment 2 (Spring rest 1 out of 4 years) would be implemented on these 4 allotments. Is this the only grazing these allotments would get? If not, what other season of use would the allotments receive? Would it continue competition for wildlife forage or would it occur during the time of year when lush new browse growth is more palatable to livestock than grasses and cause an increase of browse use before big game moves on the range?

Developments proposed include: New Gunnison - chain/seed 600 ac, fence 4.5 miles, stock trail 0.25 mi; Gypsum - chain/seed 1,760 acres, fence 5 mi., spring 1 each; New Narrows - chain/seed 5,320 acres, fence 11.5 mi., seed 1,000 acres, pipeline 6 mi., reservoirs 4 each, springs 2 each. What vegetative type would be chained? Would enough thermal cover be left standing? What would be seeded? New fences can be hazardous to wildlife, what benefits would these

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Page 1-8, Table 1-2. There is a mix of unequal units used in Table 1-2. AUMs are used in some cases and animal numbers in others.

Since AUM is the standard forage unit for all grazing animals, that standard reference should be used throughout the document. This error is repeated again in Table 2-5, page 2-28.

Page 2-6, Grazing Management Treatments, paragraph 1. The "period of grazing needed by the livestock operator" should be considered, but only after the soil, water, vegetation and unchangeable wildlife resource needs are satisfied. We suggest this change.

Pages 2-9 to 2-11, Alternative A: Optimize Non Livestock Resources. We do not support Alternative A as a whole because we believe it is biased towards single purpose management. We do support the greater amount of riparian-aquatic habitat it would protect from livestock use and the goal to improve big game habitat by realigning allotments so critical winter deer and/or elk ranges could be managed dually for wildlife and livestock. Evidence from studies made by Smith, et. al. 1979, Jensen, et al. 1972, Walimo, et. al. 1977 and others demonstrate livestock and big game grazed properly on big game winter range can support more animal units per area than the same area can support when managed exclusively for either class of animal and provide a forage with higher nutritional value.

Pages 2-11 to 2-13, Alternative B: Optimize Livestock Grazing. We do not support this alternative because it is a single purpose management proposal.

Pages 2-13 to 2-15, Alternative C: Rangeland Management Recommendation

This may be the managers preferred alternative, but from the fish and wildlife interest point of view it needs considerable revision to be acceptable.

Page 2-16, Alternative D: Eliminate Livestock Grazing. We do not support this alternative because it is not a practical proposal.

Page 2-17 Alternative E: Continuation of Present Management. This alternative is not acceptable because prior use and the present management has caused the problems needing correction. Range conditions could not be improved by this alternative.

fences serve in achieving the stated objectives? Spring development, reservoirs or pipelines for water developments would not benefit deer winter range, what importance would they contribute? Why withhold information on what grazing seasons would be implemented on an allotment until after the EIS is completed (page 2-6, paragraph 1, Grazing the Management Treatments) if full disclosure on the grazing management program is the purpose of the environmental statement? We recommend all proposed grazing seasons be disclosed in the EIS.

Answers to the preceeding questions would provide better information for the readers to predict whether objective 1, fifth sentence could be achieved as stated.

2. First sentence under Objective 7 in Table 1-1 states, "Maintain the quality and present condition of 77,478 acres of critical mule deer winter range." Where are the 77,478 acres?

3. Third, fourth and fifth sentences under Objective 7 in Table 1-1 use numbers of animals; "96 antelope ... increase to 199" "mule deer population of 17,315 ... expanded population of 41,140"; and "elk population of 656 ... increase to 700." Even though 1 cow per month equals 1 AUM, the same is not true for other grazing animals. Using antelope numbers to show an increase of 99 to 199 would only be an increase of 125 AUMs whereas if the animals were cows, it would be 1,200 AUMs. Using animal numbers for deer or antelope may appear to the uninformed person wildlife would be getting a good deal, but in fact they were getting little if anything at all compared to cows. The forage reference is described in AUMs for management purposes, not animal numbers; therefore, AUMs and animal numbers should not be used interchangeably. We recommend that since forage is allotted on the AUM basis, AUM's be used throughout the text for all foraging animal references to eliminate this confusion.

4. Objective 8 Table 1-1, states "- Manage floodplains and wetlands to improve and conserve riparian systems." Only 15 percent of the riparian-aquatic habitat would be protected and 85 percent would continue to deteriorate (pages 4-50, 4-53, 4-54 and 4-55). If this is the case should objective 8 be listed at all? What is the justification for including it in Table 1-1?

5. Objective 7, Table 1-1 sixth sentence states, "Improve 40,000 acres of sage grouse habitat." Nothing would be done under Alternative C to improve sage grouse habitat (page 4-56 and 4-57). What guidelines are you following if sage grouse habitat is to be improved by implementing Alternative C? We recommend Braun, Britt and Waltestad's, (1977) or Call's, (1979). sage grouse habitat management guidelines be followed.

Pages 2-18 to 2-20. Alternative F: Adjust Spring Livestock Use. We could not support Alternative F because it is heavily biased towards Livestock use.

Page 2-20, Monitoring Program, paragraph 1, last sentence states, "In addition, wildlife habitat, riparian vegetation, aquatic habitat utilization and trend, and watershed condition would be evaluated." The monitoring programs for items 1 through 4 mentioned earlier in the same paragraph are identified in the text and procedures for monitoring them are described; however, no wildlife monitoring programs or any discussion of how the findings would be used were identified. What wildlife habitat would be monitored? What procedures would be used? What would the results of wildlife habitat monitoring be used for and how?

Riparian areas have not been inventoried although their conditions are considered poor (page 3-5) and if Alternative C is implemented, it is predicted most (85%) of the riparian-aquatic habitat would not improve (pages 4-50, 4-54 and 4-57). How could a resource monitoring program be implemented without an inventory of the resource base? Why monitor resources that are predicted to remain in poor condition? If monitoring the riparian-aquatic habitat shows the predictions are true and the riparian-aquatic habitat conditions are remaining poor or getting worse, what would be done about it? When?

Page 2-23, Standard Design, Construction, and Operation Features. Number 10 states, "When possible, water for wildlife would be maintained throughout the year..." What determines "when possible"? We recommend water remain available for wildlife throughout the freeze-free period. Cutting off a water source for wildlife dependent on it can be disastrous for many species.

Page 2-22 through 2-24, Standard Design, Construction, and Operation Features. Sage grouse are a very important wildlife resource in Utah on public lands. No provisions are provided in the Standard Design, Construction, and Operation Features to protect sage grouse habitat from destruction if the proposed action is implemented. We believe this wildlife resource is too valuable to the public and the State of Utah to receive this neglect. We recommend that all proposed sagebrush treatment plans include an extensive pre-treatment survey to determine whether the area is a wintering or breeding/nesting habitat for sage grouse. Sage grouse winter range can be identified by their weather resistant droppings at any time of the year.

Once sage grouse habitat is identified, we recommend the sage grouse habitat management guidelines described by Braun, Britt and Wallestad (1977) or Call (1979) be followed. The pre-treatment survey should be done jointly by BLM and the Division of Wildlife Resources.

Page 2-27, Water Developments, number 7 states in part, "Drinking ramps would be installed, and tank or trough heights would not prohibit young animals from obtaining water." We recommend this design be changed to include "ground level water would be available for wildlife all water developments during the freeze-free period." Pre-fledged chuckars, sage grouse and small mammals could not drink water at a trough or tank without a ground level source. Water is an essential need for their survival during the pre-fledged period.

Page 2-28, Table 2-5. Table 2-5 uses a mix of AUMs and animal numbers as reference values. Because all forage allocations are made in AUMs, they should be used in all comparative references. See our previous comment on this point.

Page 3-13, Terrestrial Animals, paragraph 1 reads, "those animals of public concern...include big game, threatened and endangered animals, and sage grouse." If sage grouse are animals of "public concern", why aren't some provisions made to identify sage grouse habitat and managing it following recognized guidelines for sage grouse habitat management (pages 2- 13 through 2-15, Description of Alternatives)?

Page 3-22, Fish, In paragraph 3 it reads, "...yellow perch, and great northern pike.... Delete great, the accepted common name for Esox lucius is northern pike (Bailey, et. al. 1970).

Page 3-29, Attitudes and Lifestyles. This entire section appears to be based on subjective thinking and non-professionally done. Deer hunters alone, hunting deer dependent on habitat on Mountain Valley public lands far outnumber the 111 livestock operators in the planning area. These hunter users are probably all citizens of the United States, and co-owners of the public lands and the majority of them residents of Utah. Wildlife agency professionals who regularly meet with hunters can attest to the fact that deer hunters are equally intent users of public lands and would strongly object to being considered "outside multi-interests" as you state. We recommend a documentation of your source material for such comments or change it to a more objective description of the users attitudes and lifestyles.

Page 3-29, Attitudes and lifestyles, final sentence reads, "As a whole, environmental groups feel that public lands should be managed to the extent that they function as natural area environmental baselines." We recognize some environmental groups do support that philosophy but we also believe this is a gross overstatement and should be supported by documentation or deleted. How many environmental groups are there? How many of them have by-laws or objectives supporting your statement? Do they all support the philosophy you say they do?

Page 4-1, Basic Assumptions and Analysis Guidelines, Number 9 states, "Since actual livestock use is unknown, ... Does this mean there is, or could be trespass livestock?"

Page 4-3, paragraph 3 states, "Impacts to endangered or threatened plant species due to grazing have not been documented. There is no evidence linking present or past declines in the population or vigor of these plants to levels of grazing use." These statements are in error and should be deleted. The clay phacelia (*Phacelia argillacea*), a Federally listed endangered species (although outside the Mountain Valley Planning Area) was severely trampled and some parts eaten back so severely they could not survive (Neese, 1980, personal communication). The Aquarius paintbrush (*Castilleja aquariensis*) has a healthy population inside an enclosure but it quickly tapers off to no specimens within a few yards outside the enclosure because these plants are eaten off before they can set seeds (Neese, 1980, personal communication). Other plants recommended by Welsh for threatened or endangered status have grazing or trampling listed as existing or potential threats (Welsh, 1979).

Page 4-6, Vegetation Modification, reads "Past heavy grazing, along with several years of drought, have adversely modified the natural vegetation ... "Natural vegetation" evolved over thousands of years enduring several years drought in each decade without dramatic change. Heavy grazing is a recent major adverse action imposed on natural vegetation and can be correlated with the adverse modification of natural vegetation. The major underlying cause of adverse modification is heavy grazing, not several years of drought as stated. We recommend a change in the text to correct this error.

Page 4-8, Riparian Vegetation, paragraph 1, recognizes the adverse impacts on riparian habitat caused by grazing cattle in the following way, "...grazing along riparian areas at any level by cattle is detrimental to riparian vegetation." Heavy grazing of riparian-aquatic habitats also accelerates soil erosion, sediment yield, soil compaction (Page 4-10); reduces water quality, eliminates streambank shrubs, increases water temperature, breaks down streambanks (page 4-15); and affects the productivity of fishing streams (4-19). These are some of the problems Executive Order 11990 and the Bureau of Land Management's Wetland - Riparian Area Protection and Management; Policy and Protection Procedures are intended to correct. Alternative C could not have been planned with Executive Order and policy in mind because it provides protection to only a token amount of the limited riparian-aquatic habitats (page 4-50) while the other alternatives vary in the amount of the riparian-aquatic habitat protection they would afford. Is the District Manager aware of the provisions of Executive Order 11990 and BLMs Wetland-Riparian Protection and Management Policy? Do you believe Alternative C would meet those requirements? We strongly recommend compliance with this order and management guidelines, and will gladly assist you in any way we can to meet compliance with them.

Page 4-17, paragraph 3 states, "On eight allotments of critical deer winter range, treatment 4 would be initiated to benefit deer." What eight allotments?

Page 4-19, Fish and Aquatic Animals, paragraph 2 states, "Livestock and wildlife grazing of riparian habitat decreases or eliminates vegetation and causes trampling of streambanks." Where in the Mountain Valley Planning area is wildlife use of riparian areas high enough to cause a measurable amount of "trampling damage to streambanks" or decrease in forage? What big game species? Which forage plants? How do you differentiate a decrease in vegetation or trampling damage caused by livestock from wildlife? If wildlife is not causing a measurable "decreased vegetation or streambank trampling" in riparian-aquatic habitats the erroneous statement should be changed and the correct cause identified.

Page 4-23, Allotment Combination. The FWS supports realigning and/or combining allotments for efficiency and better management. There are some other points to consider when readjusting allotments than those you made in the draft EIS.

The proper class of livestock grazed in each allotment should be based on what that allotment is best suited for and what other resources need. We believe each allotment should be identified in the EIS as best suited for a certain class of livestock and the reasons why, possibly in an appendix.

In some areas where several livestock operators share large community pastures they jointly purchase high grade bulls for their mutual breeding programs. As a group or association, they share in the benefits as well as the costs of high grade bulls. This can be a definite advantage to smaller operators.

Page 4-24, Range Developments. We suggest that when riparian-aquatic areas are fenced, off-site water sources for livestock be provided. This may increase costs, but it eliminates the impacts too.

Page 4-55, Mule deer, paragraph 3 states, "Vegetation modification of 40,270 acres is also proposed to improve vegetation.", and in the next paragraph it reads, "seventy-five water developments would provide additional sources of water for better distribution of these animals." Since summer deer range was not identified as a problem, is the vegetation modification to improve deer winter range? If so, how would additional water sources improve deer distribution? What evidence is there to support the idea better deer distribution would occur on the winter range if more water sources were provided? How would the icing problem be handled? If the needs of these water developments for deer can be supported the point is properly made under mule deer. If not, it should be deleted.

Page 4-56, Antelope. This section appears to have errors and misleading statements which need better supporting documentation or they should be deleted. Question: What evidence from Stoddard, et. al. is there that chaining and seeding 10,680 acres would be beneficial to antelope? We don't believe habitat improvement for antelope has been extensively studied to draw such conclusions.

Question: If BLM has a fencing policy that requires new fences in antelope habitat to be constructed to allow antelope to crawl under, why would new fences be a hazard to antelope?

Planning to increase the antelope population on nearly half a million acres of public lands by 63 head over 20 years does not appear to be evidence of a strong multiple use planning effort. We believe any combination of poaching, predation, drought or disease could cause population fluctuations greater than the anticipated 20-year increase. Question: Can livestock be managed closely enough to assure 199 AUMs are available for antelope and not exceed the proper use factor of the key vegetation? Is it possible to measure 199 AUMs difference between forage used by livestock and antelope on the several collective allotments antelope use?

We believe BLM should take a more positive action to increase the antelope population by a measurable degree in the Mountain Valley planning area if multiple use is an objective of public land management programs and delete references to unmeasurable quantities.

Page 4-99, Mule Deer, paragraph 3 states, "... in the short term from 15,460 AUMs (17,933 deer) to 15,296 AUMs (17,743 deer), a decrease of 190 deer. Does the Richfield BLM District have the expertise to manage nearly a half million acres with the precision necessary to gain or lose 190 head of mule deer, 63 antelope (page 4-99, Antelope, paragraph 2) or 6 elk (page 4-100, paragraph 2, Elk)? If not, we believe creditability would be better maintained if these statements were deleted.

Page 4-101, Summary, paragraph 3 states, "The long-term impacts to sage grouse would be undetermined if the proposal turned the ecosystem into predominantly grass." This is an erroneous statement and should be deleted. All sage grouse workers would agree, if the ecosystem were converted to predominately grass, sage grouse would be eliminated. References are adequately available in any compilation of sage grouse literature to reach that conclusion.

Page 4-101, Conclusion states, "endangered Utah prairie dog and sage grouse would increase." This is in conflict with previous statements on these animals (pages 4-100 and 4-101).

The Endangered Species Act (ESA) requires federal agencies to consult with the Fish and Wildlife Service (FWS) for proposed projects which may affect threatened and endangered species. We suggest BLM initiate Section 7 consultation with FWS since the proposed action may impact the Utah prairie dog.

Rydberg milkvetch (*Astragalus perianus*) is the only federally listed plant among the 11 plants that you cited as threatened or endangered in Table 31 of the EIS. However, this plant does not occur in the proposed project area. The remaining 10 plants are not listed or proposed for listing. Consequently, BLM does not need to request Section 7 consultation on these plant and their status should be clarified in the final EIS.

Last chance townsendia (*Townsendia aprica*) is imperilled. We will likely address this species in the biological opinion since it may be listed in the near future.

We thank you for this opportunity to review and comment on the Mountain Valley Grazing Management draft environmental statement.

Robert H. Shipe

LITERATURE CITED

Responses to Letter 20

- 20.1 A review of proposed changes in Alternative C, continues to support the analysis that deer habitat would be improved over the long term.
 - 20.2 Alternative A, Page 4-9, proposes that 20 miles (244 acres) of the estimated (488 acres) of riparian vegetation be fenced to exclude cattle. The remaining 20 miles of riparian habitat would remain unfenced; however, it is located in sheep grazing allotments or in no livestock grazing allotments. Under this alternative, the quality of the riparian vegetation is expected to show a considerable improvement. The wetland-riparian area protection and management policy and protection procedures became effective after the planning was completed. Alternative A was developed with the Wetland-Riparian Guidelines in mind. Prior to making decisions and completion of MFP 3 the intent of E0 11990 and the guidelines will be complied with according to BLM Manual 6740 (Wetland Area Protection and Management).
 - 20.3 The Rangeland Objectives listed in Table 1-1 are the planning objectives of the individual resource specialist for each resource and therefore may be contradictory. During the planning process, compromises between the programs (stated objectives) of various resources resulted in an alternative (C) which best meets all of the resource objectives. All the resource objectives are met cumulatively in the alternatives. However, no single alternative will accomplish all of the objectives.
 - 20.4 The seasons of use shown in Appendix II-1 Tables A through F are the only seasons in which livestock would be allowed to graze. Likewise, when grazing treatment No. 2 says spring rest one out of four years, there would be no livestock use during the rest period.
 - 20.5 The seasons of use outlined in the description of the alternatives would allow livestock use of up to 50 percent of key species during that period. The seasons of use and grazing treatments change under each alternative for the purpose of analyzing competition between big game and livestock. If competition between livestock and big game is causing or is predicted to cause range degradation or decline in big game numbers, an alternative can be selected which avoids these problems in the individual allotments.
 - 20.6. Big sagebrush and pinyon-juniper vegetation types would be chained as described in the "Vegetation Modification" headings in the vegetation sections of Chapter 4, (Page 4-49 for Alternative C). For information regarding modifications in individual allotments, see Appendix II-1. Coordination with UDWIR would assure that adequate thermal cover would be left. See Page 2-23 No. 13. Refer to No. 6 on Page 2-26 for seed mixtures.
 - 20.7 New fences would be needed for proper livestock control, to give better distribution, help prevent trespass, facilitate pasture management systems, etc. The fences would be built to specifications required by the BLM to minimize hazards to wildlife. It is recognized that any new fence usually has short-term detrimental effects to wildlife species; however, long-term benefits derived far outweigh the negative short-term impacts. See Page 4-37 under Mule Deer.
- Bailey, Reeve M., John E. Fitch, Earl S. Hearld, Ernest A. Lachner, C.C. Lindsey, C. Richard Robbins and W.B. Scott. 1970. A List of Common and Scientific Names of Fishes from the United States and Canada. Amer. Fisheries Society, Special Publication No. 6. 3d Edition. Wash, D.C. 150 p.
- Braun, Clait, Tim Britt and Dick Wallestad. 1977. Guidelines for Maintenance of sage grouse habitat. Wildlife Society Bulletin 5(S): 99-106 p.
- Call, Mayo W. 1979. Habitat requirements and management recommendations for sage grouse, Technical Note, U.S. Dept. Interior - BLM 37 p.
- Jensen, Charles H., Arthur D. Smith, and George W. Scotter. 1972. Guidelines for grazing sheep on rangelands used by big game in winter. J. Range Manage. 25(5): 346-352.
- Smith, Michael A., John C. Maecheck, and Kenneth O. Fulgham. 1979. Forage selection by mule deer on winter range grazed by sheep in spring. J. Range Manage. 3(1): 40-45.
- Stoddart, Lawrence A. and Arthur D. Smith. 1955. Range Management. McGraw-Hill Book Co. New York, New York. Second Ed. 433 p.
- Wallmo, O.C., L.H. Carpenter, W. L. Regelin, R. B. Gill, and D.L. Baker. 1977. Evaluation of deer habitat on a nutritional basis. J. Range Manage. 30(2): 122-127
- Welsh, S.L. 1979. Illustrated Manual of Proposed Endangered and Threatened Plants of Utah, Submitted to U.S. Fish and Wildlife Service, Denver, Colorado. Funded by U.S. Fish and Wildlife Service, Bureau of Land Management and U.S. Forest Service, 318 pages. Illustrated.
- Yoakum, James D. and Donald E. Spalinger. 1979. American Pronghorn Antelope - Articles published in the Journal of Wildlife Management 1937-1977. The Wildlife Society. Washington, D.C. 244 pages.

20.8 New water developments would benefit deer winter range in two ways. First, by getting better livestock distribution which would in the long term improve the winter range overall by eliminating the overused areas near existing water; and, secondly, by opening up new areas for big game use that are not now usable during snow-free months.

During the 5-month big game winter season, there is often no snow on the ground and weather is moderate with no frozen water. There are areas of winter range that cannot be used unless snow is on the ground. Development of water sources would expand the use of these areas and enhance the quality of the available habitat.

20.9 See Appendix II-1 for the proposed season of use for each alternative.

20.10 See Pages 3-14 and 3-15, Figure 3-4. The winter ranges are located within the shaded areas which depict mule deer concentrations areas.

20.11 It is important to show both AUMs and/or numbers of animals as done in this EIS. Neither is used without first being identified as AUMs or number of animals so the reader should not be misled. Conversion ratios for big game AUMs to numbers of animals can be found on Page R-58.

20.12 See Letter Responses 20.2 and 20.3. Every alternative is not designed to meet all objectives. The pages referred to pertain only to Alternative C. Alternatives A and D conform fully to objective 8.

20.13 See Page 2-23, Item 13.

20.14 See Text Revision section, Page 3-8 for correction of Table 1-2. However, some of the numbers in Table 2-5 do not lend themselves to quantification in terms of AUMs.

20.15 The statement referred to includes consideration of these elements. On Page 2-6, big game is included in "kind of grazing animal."

20.16 Wildlife monitoring programs would be detailed in habitat management plans tailor made to achieve the results desired under the selected alternative. The programs for monitoring are common to all six alternatives, the degree of monitoring and the program design may differ under each alternative.

20.17 See Page 2-20 monitoring program. Habitats to be monitored would be deer, elk, and antelope crucial winter ranges; prairie dog colonies, sage-grouse strutting grounds, and riparian/wetland zones. Monitoring data would be used to determine what effect the authorized livestock grazing in conjunction with wildlife use would have on the various habitats. Monitoring procedures would be developed during AMP/HMP planning.

20.18 A monitoring program would commence with an inventory of the existing riparian vegetation and this data would be used as a base point for future trend computation.

20.19 If the resource is in poor condition and predicted to remain poor, it may be necessary to alter the selected alternative. If, through monitoring, it is determined that irreparable damage is likely to occur, then adjustments to the alternative would be implemented. See Pages 2-20 and 2-21.

20.20 The water development would be kept functional during the freeze-free period; however, BLM would not haul water if the natural supply dries up.

20.21 See Page 2-23 and 2-24, Item 13 for design features. Also, see Figure 3-6, Pages 3-20 and 3-21 for sagegrouse habitat.

20.22 See Pages 2-26 and 2-27.

20.23 See Letter Response 20.21.

20.24 See Text Revision section, Page 3-22.

20.25 The description of the affected environment, Page 3-29, portrays livestock operators' attitudes, and as such is often subjective or even prejudicial. Public comments throughout the planning process document these attitudes. See Text Revision section, Page 3-29.

20.26 See Text Revision section, Page 3-29.

20.27 There has been livestock trespass on some allotments and on others there has been less actual use than was licensed.

20.28 See Text Revision section, Page 4-3.

20.29 See Text Revision section, Page 4-6.

20.30 See Letter Response 20.2.

20.31 The eight allotments are: Kingston Canyon, South Hollow, Aurora, Horse Ridge, Chicken Coop, Uintah, North Hollow, and Flat Canyon. They are shown in Appendix II-1, Table A and are identified by looking in the column which lists grazing treatments.

20.32 See Text Revision section, Page 4-19.

20.33 Allotments were not identified as being best suited for a particular kind of animal because of the number of variables involved, and because this has not been identified as an issue. As long as current and future needs of each resource are taken into consideration, and grazing use does not exceed the range's carrying capacity, nor adversely affects plant growth and reproduction, "best suitability" for a particular kind of animal is not an important range management factor.

20.34 See Letter Response 14.7 and Text Revision section, Page 2-6.

20.35 See Letter Response 20.8.

20.36 The quote from Stoddard et al. on Page 4-56 was, "soon after an area is disturbed, forbs used by antelope become reestablished". The point that was made was that the chaining and seeding would cause an increase in plant diversity and provide more available forbs. The beneficial effects of diversity for antelope in an area where vegetation was practically monotypic is well documented.

Richfield District Manager
Bureau of Land Management
Richfield, Utah 84701

Comments on Mtn. Valley Draft E.I.S.

20.37 Any new fence, even when mitigated by a particular design, has a short-term detrimental effect on wildlife primarily until they learn to negotiate (cross/crawl through) it or avoid it. Some animals, however, miscalculate and get caught in the fence or slow down too much from a pursuing predator and are caught. See Pages 4-37 and 4-38.

20.38 Antelope presently exist on nine allotments and 98,987 acres not on nearly 0.5 million acres. Antelope are not well established in the Mountain Valley area because of the Federal land and private land relationship. There is strong opposition to any increase of any big game animals in the valley areas. The intent of allowing 199 AUMs available for antelope is to recognize that they do exist and some allocation is given to them. This seems to be the only way to communicate, quantitatively what might happen. There is no intent to give the impression of precision management. It is understood that the forage survey and evaluation data may not be precise. The credibility is good when consideration is given to the total AUM allocations and recognition that wildlife are given AUMs based on the best possible data.

By using the present management procedures of reducing game herds where necessary, in cooperation with the Board of Big Game Control, Forest Service, and UDMR, big game reductions can be accomplished. The decrease or increase would not take place over the entire planning area but only as needed on specific allotments or problem areas. See Appendix II-1, Tables A through F.

20.39 See Text Revision section, Page 4-101.

There is agreement that "initially" there would be actions taken to curtail spring livestock grazing. However, over the long term (20 years), the potential is there to start turning the ecosystem to predominantly grass. This transition could probably just begin to adversely affect populations of prairie dogs and sagegrouse at the end of 20 years.

20.40 See Text Revision section, Page 4-101 to 4-102.

20.41 The Utah prairie dog is found only in the Cedar Grove Allotment and was covered by the USFWS biological opinion for the Parker Mountain EIS. The actions proposed are similar so the same impacts are anticipated as were discussed in the Parker Mountain EIS.

20.42 See Text Revision section, Page 3-5.

21.1 1: The Draft E.I.S. does not meet the requirements of the 1975 Court Order won by N.R.D.C.

Order: E.I.S. to compare, Livestock Grazing Vs No Livestock Grazing on Public Land.

21.2 Here I would request a report be included to show what domestic livestock diseases does to game herds.

(ie) Vibriosis & Bangs Disease
Shipping Fever
Blackleg
Red Nose
Red Water
Big Head etc.

21.3 2: Arizona State University & Texas Parks Department study revealed deer brought \$88.65/AUM Vs cattle brought \$25.44/AUM.

How Much is a Deer Worth?

□ There's no way you can put a dollar value on a day or season of deer hunting. Time in the fields is priceless recreation. Nevertheless, there are those who try to put a price tag on hunting in various ways —license costs, miles driven, arms and equipment purchased and so on. Recently two new methods have come to light.

Another new way to figure the value of deer as a crop resulted from a 1974-1976 study on the economics of deer versus livestock production by the Texas Parks and Wildlife Department. They determined that the income from deer was greater per animal unit (AU) than for cattle raised on the Kerr Wildlife Management Area. An AU is based on the amount of feeding pressure put on the range by one average size cow or about 5½ deer. The highest return was in 1976, when the net income from deer was \$88.65 per AU for deer and \$25.44 for cattle.

The high deer return was due in part to the excellent harvest —25 percent of the herd. Officials feel that this level could be repeated annually.

Still, no one has been able to compute the feeling you get when your family sits down to a venison roast—provided by you at a cost of too much per pound, but worth a king's ransom in the deep down satisfaction of a successful hunt.

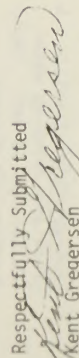


According to Arizona State University Professor Sidney Wilcox, the total value of the deer meat harvested in the state of Texas during the 1975 season was \$12,055,050.

Texas was the top deer state, followed by New York (\$10.6 million), and Michigan (\$9.7 million). Wilcox based his figures on questionnaires he submitted to state game agencies. Texas reported a harvest of 349,000 whitetails.

- 21.4 3: Ref: 2-14 (1b)
36,363 new AUM's created with tax dollars should be allocated to:
(a) Game-Wildlife
(b) New permittee
- 21.5 Trespass rules should be strictly enforced as a Number one management tool.
Ref: 4-1, #9 & 4-5 & 1-1
- 21.6 4: Ref: 2-5 (4d)
116 miles fence recommended.
No Fences:
(a) Too Costly
(b) Not compatible with wildlife
(c) Creates concentration instead of distribution of domestic livestock.
(d) Hazardous to 90% of Public Land users
- 21.7 5: B.L.M. should not recommend any of the Alternatives until after the public input period.
- 21.8 6: Charts about livestock operations have no purpose and are not a part of the E.I.S.
- 21.9 condense the E.I.S. and reduce to laymen's terms, so more people will contribute input.
- 21.10 7: Include figures of what number of cattle can be produced on the total AUM per year and what the costs to the taxpayer will be.
Example: 36,000 AUM = 3,000 cattle/year on 12 month/year could be produced (total capacity)
3,000 cattle = 1.5% days slaughter
200,000 slaughter nationally slaughter/year
At what cost to taxpayer? B.L.M. please supply figures.
- 8: Taxpayers should not support stockmen. The stockmen do not support our Country in time of war. They got deferements.
- 9: We approve Alternate "D" in the draft E.I.S.
"Remove the Livestock"

Respectfully Submitted



Kent Gregersen
Representative, Antermountain Mustang Association
P.O. Box 102
Marysville, Utah 84750

Responses to Letter 21

- 21.1 Alternative D analyzes the elimination of livestock grazing. This alternative is evaluated as compared to livestock grazing in the other alternatives which propose various levels of livestock grazing.
- 21.2 Domestic livestock diseases were not discussed in this EIS because they were not an issue raised during the scoping process. The following is a brief report about the diseases mentioned in the comment and others that might be of concern:

Vibriosis: A reproductive disease, transmitted venereally by male animals. Primarily a cattle disease, no spread by cattle to big game. Sheep organism is different and disease is spread by contact with fetal materials. Where lambing on the range is permitted, some hazard exists to wildlife but it is not recognized as a wildlife disease or has there been a problem.

Bangs Disease (Brucellosis) Bangs does occur in wildlife--primarily buffalo, but it has not been found in elk or deer. Utah State law requires quarantine and complete control of this disease in domestic livestock. The chance of spreading to deer and elk is remote. Buffalo must be treated and cared for much the same as cattle. Spread is by contact. It can spread from buffalo to cattle and vice versa.

Shipping fever: This is a complex of organisms that attack an animal when it is stressed. This disease or complex of diseases, are not contagious in animals or between them, so game animals have never been known to have it except as it occurs naturally. Generally some type of respiratory malfunction.

Black leg: Very contagious in cattle, but has been found only in cattle and sheep. Causes very rapid death. Not known in game animals.

Red nose or IBR: (Infection Bovin Rinotracheitis). A reproductive disease in dairy and beef cattle and calves. It has also been found in steers, but not known in wildlife in this area. Spread venereally primarily and this is probably why it is not transmitted readily to wildlife.

Red water: Kidney disease and breakdown of kidney functions. Very low incident on ranges if any. Not known to infect wildlife. Found in beef cattle and some dairy herds. Spread by contact with ticks, fleas, mosquitoes, etc. Buffalo and cattle are affected. It can be transmitted back and forth.

Big head: Not found in big game. It is poisonous plant caused and occurs in sheep only. It is also a bacterial disease of lambs to yearlings in sheep only.

Leptospirosis (Lepto). A reproductive disease. Spread through urine and drinking water. Spread to all class of livestock and is transmitted to man. Could be a problem to wildlife, but not known. A water-born disease.

Anaplasmosis: Livestock and game blood disease transmitted by ticks, mosquitoes, and any biting insects. Red blood cells are destroyed. Found in livestock and game animals alike. Livestock people concerned about wildlife spreading to livestock. Very common and occurs naturally with both livestock and wildlife.

If and when these diseases become a problem and are recognized by UOWR as needing attention, some action would be taken by BLM, private livestock operators, and UOWR to correct the situation. Prevention and cures are available in most cases.

Contacts with extension specialists, Utah State University, and UOWR show the relationship of domestic livestock disease to game herds.

21.3 No attempt was made to compare the value of livestock and big game because such a comparison would not be valid.

There is no shortage of studies, such as those cited, that attempt to put a market value on the non-market commodities of hunting and the food thereby provided. However, these studies are very often special cases and not generally applicable (such as the Kern Wildlife Management Area study), or are based on data or assumptions that do not project a true value of the resource.

While it may be possible to find a common ground for comparison of the two, this would require a good deal of very detailed data. Unfortunately, the data available for this planning area (and most others) is limited and does not even begin to approach the level of detail required for a valid comparison.

An attempt has been made to show a value for deer, using three different methods, in the Planning Area Analysis. However, as stated above, the individual methods fall short of validity and there is no way to combine them with any validity.

21.4 In order to get the full picture, there would be approximately 36,363 AUMs for livestock and 23,104 AUMs for wildlife for a total of 59,467 AUMs in the long term. These are not newly created AUMs either, because there were already 29,411 AUMs for livestock and 16,449 AUMs for wildlife in the initial phase. So the newly created would be just the difference, i.e., 13,607 AUMs.

There are Interior Department and BLM regulations and policy on how to allocate new AUMs. These instructions would be followed in allocation of new forage. Basically, the BLM and Department guidelines say that new forage will be allocated to existing permittees and big game. New permittees would be sought only after existing problems were solved.

21.5 By policy and instruction, trespass laws should be strictly enforced and as management intensifies they would be strictly enforced. The enforcement of trespass laws becomes easier when EISs are printed because seasons of use and numbers of livestock are shown by allotment. It not only becomes easier for BLM employees to know what should and should not be going on in an allotment, but also for the general public. The EIS will make all future trespass highly visible.

21.6 Historically fencing has been an area of controversy on western ranges. However, those involved with livestock grazing and researchers in range science and management systems know that where cattle are grazed, some fencing is necessary to control livestock movement. Wildlife experts have helped in developing fences that reduce the impacts to wildlife. Fences are also used to protect some critical areas from livestock use.

21.7 The BLM is required by the National Environmental Policy Act, (Title 40--Protection of the Environment, Rules and Regulations) to provide a proposed action and preferred agency alternative for the public to look at and help analyze. The recommended alternative was developed after scoping and public input. The final decision on alternative selection will not be made until all public comments are received and analyzed.

21.8 Livestock grazing is conducted by livestock operators or owners. The management and improvement of ranges is very much affected by livestock operations and how they conduct their private business. Without the said charts, individual operators could not understand what the proposed action would be to individual allotments.

21.9 Currently, there is a real effort in EIS development work to condense and simplify the materials. However, it is difficult to write detailed and technical data necessary to portray the livestock grazing situation and future program into few pages or paragraphs.

21.10 The following method was used to determine a rough estimate of the cost to the BLM (taxpayer) to provide an AUM of feed for livestock in Utah: (1978 data)

	\$2,541,887	Range Management ^a
	+628,537	Range Improvements ^a
	\$3,170,424	Appropriated funds for livestock grazing
	-1,175,402	Cash receipts from grazing ^a
	\$1,995,022	Net Cost for Livestock Grazing

\$1,995,022 ÷ 1,023,088 Livestock AUMs = \$1.95/livestock AUM

^aBLM Facts and Figures, 1978.

The average season of use for livestock on the planning area is about 2 months, the remainder of the year is spend on National Forest, State, and private land. However, if it is simply assumed that all 47,835 AUMs on the planning area are grazed for a full year, they would feed 3,986 cows. Based on the figure of 92,270 (USOA-ESCS, the average daily slaughter rate for cattle in 1979), the planning area could supply 0.01 percent of the national daily slaughter cattle.

The total cost to the BLM/taxpayer can be estimated by multiplying the 47,835 AUMs by \$1.95 to obtain a figure of \$93,280. On a per capita basis, the estimated 218 million people in the county in 1978 paid about \$0.0004 each to support the livestock AUMs in this planning area.

July 20, 1980

Mr. Donald R. Pendleton
District Manager
Bureau of Land Management
Richfield, Ut.

Re: DEIS Mountain Valley Grazing District

After reviewing the different alternatives as identified in the draft, I do not believe that any single alternative should be selected to operate under. Rather, certain combinations or aspects of the different alternatives should be applied in the management of the various grazing allotments.

Some allotment combinations are suggested for easier BLM Management. This should be applicable wherever feasible. However, combining too many different individual operations could result in undesired management. Also, from the standpoint of easier management, BLM should adopt some type of land exchange policy. Not only with other government agencies, but with private land owners as well. Exchanging isolated parcels and blocking-up of lands would ease the burden of management for everyone concerned.

The proposed wildlife allocation under all the alternatives is very disturbing. On allotments that I am acquainted with, these current use figures simply do not exist. The 5.8 deer ratio per AUM and estimated prior stable population figures are very questionable. And, when the formula is applied to total allotment acreage; it becomes out of proportion. The percentage of the allotment classified as deer winter range is over-estimated. Wintering deer use (on allotments I am acquainted with), is confined to the higher elevations where deer browse and tree cover are afforded and where little livestock grazing occurs.

If in the computation, to establish a wildlife allocation--prior stable wildlife figures are used; then prior stable livestock figures should be computed also. This would be the preference, and the proportion of use would become more equitable.

BLM figures as computed in the draft, show a larger percentage of private lands in Sanpete County compared to BLM acreage; than other counties in the Planning Area. This proposed wildlife allocation, not only reduces the permittees use on BLM lands; but reduces usage of his own private lands. Wherein does he become compensated? Can BLM and UDMR confiscate property?

Livestock reductions as proposed; does nothing for the present operator. When family operations are curtailed to the point they are no longer economically sound to operate, the business dies. We are looking at a new generation in the next 20 years. Whom, will be around to pick it up?

22.7

All measures of revegetation and increased productivity should be exhausted before reductions are made except those employed for protection of seedings. A crash program of revegetation should be implemented. More acreage than has been identified or designated can and should be reclaimed. Most improvements in past performance by BLM has been carried out on cattle allotments. This policy must change.

22.8

Now, since each of the 5 BLM allotments that I use are treated within the Draft EIS: I must address them from a personal standpoint. I was raised and grew up on these lands. In my lifetime there is not and never has been--- 357 deer on my Antelope Valley Allotment for 5 mths.

266 " " " Long Flat " " "

89 " " " Swedes Canyon " " "

98 " " " West Side Canyon " " "

The only estimated current use that I can go along with occurs on Maple Canyon where a heavier winter deer concentration exists. This involves 1610 acres of BLM lands and 1241 acres of private lands. I, do not agree with the projected increases in deer and elk numbers in the long term.

I hereby request that BLM allow the number of sheep and the AUM'S that I removed from these allotments for range protection during the drought years and that they be restored to licensed use and current use status. The drought was an act of God, and if it had not occurred these AUM'S would have been used. It appears that all unused AUM'S are being requested for wildlife allocations.

22.9

I further request that allotment boundary lines on Maple Canyon be restored as they were at the time I purchased the Claud Maylett interests. That BLM acreage West of Sanpitch river Sections 5, 6 and 7 Range 19 So. 2 East and lands within Sections 1 and 12 19 So. 1 East be computed in my Antelope Valley allotment. It appears this acreage has been overlooked.

That the 2 sections of BLM lands below highway North & West of Gunnison be computed with my West Side Allotment as originally was when first acquired. This makes some difference in projected reductions.

Should these projected reductions occur, I stand to loose \$25, to \$30,000.00 in permit values to say nothing about the revenue lost in wool and lamb production from numbers I no longer can run.

I do not believe that such reductions as proposed are necessary on allotments in good and improving condition.

Sincerely,

Kay Fritschknecht
Kay Fritschknecht

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Responses to Letter 22

22.1 See Letter Response 4.1.

22.2 The BLM does have an active land exchange program and presently has several land exchanges in progress, not only with government agencies but with private individuals as well. The one requirement of land exchange is that the transaction be in the best interest to the Government.

22.3 See Letter Response 4.3.

22.4 Alternative E considers the preference level of use by livestock.

22.5 The allocation to big game is required by the Taylor Grazing Act, Multiple Use Act, and FLPMA and is in the best interest of land management. Too many times in past management, big game has not been allocated forage; thus, when livestock was given the forage, an overuse of the ranges occurred. With the exception of Alternatives A, D, and E the overall allocation is increased for livestock from the present situation. Wildlife allocation is increased only in Alternatives A and D. The range improvements for forage increases would help take care of projected wildlife increases. If this cannot be accomplished, certainly private lands cannot be expected to absorb the increase. Big game damage to private lands is compensated for by the State of Utah. The landowner and UDWL can work toward a satisfactory solution. The BLM does not confiscate private property, however, as an agency of the United States, BLM does have the right of Eminent Domain and can condemn property for needs in the best interest of the public. We cannot answer for the UDWL and the State of Utah.

22.6 It is not the intent of this EIS or BLM programs to curtail livestock operations. BLM goals are to stabilize livestock grazing on western ranges where possible. This involves maintaining and improving the vegetation and range condition and trend. Economists are employed to evaluate the balance between economically sound operations and those that are not or would not be after the proposed management would be implemented. The decision to curtail operations would be made after all facts are known. Some alternatives in this EIS improve the economic situation of individual livestock operators.

22.7 See Letter Response 13.6.

22.8 See Letter Response 4.3.

22.9 Each alternative is different and the basis for allocation was what actually existed on the ground as determined by the range survey. The rationale for each alternative is different; big game needs were not the basis for all alternatives. Alternative A gave priority to big game; Alternative B gave livestock priority; Alternative C compromised between livestock and big game; Alternative D eliminated livestock grazing and gave big game all useable forage; Alternative E allocated all forage useable by livestock up to preference level with balance allocated to big game; and Alternative F reduced livestock use in the spring season and provided a slight decrease in big game usage.

PUBLIC HEARING COMMENTS

Public hearings were held July 8, 1980 at Junction, Utah; July 9, 1980 at Manti, Utah; and July 10, 1980 at Richfield, Utah. The public hearings were conducted for the purpose of receiving comments regarding the Mountain Valley DEIS.

Comments 1-5 were presented at Junction, 6-13 at Manti, and 14-21 at Richfield.

Comment 1: Van A. Wiley.

...We worked a long time with BLM originally to establish more or less individual allotments in the Antimony area. Eventually, it was accomplished to some individual allotments, some with two or three permittees and in this process, you propose.... We worked long and hard and spent a lot of money building fences, getting these individual allotments, and we just don't want to see them combined and put into a unit where there has been a lot of abuse, a lot of people that haven't been that concerned with the welfare of the range, and we feel like we're responsible, that we have tried very hard to cooperate with the BLM in the past and we would like to continue cooperating.

Response: See Letter Response 9.1.

Comment 2: Van A. Wiley.

...My comments, of course, are partly taken care of by saying your data is old. It is inaccurate, to be quite frank, it is very inaccurate, it is not even close. Your game surveys are way off, your actual use is way off, you are not even close....

Response: See Letter Response 4.2.

Comment 3: Van A. Wiley.

...They (antelope) are proliferating at a tremendous rate. You say they are static, they are not even close. They are just proliferating like rabbits over on the Parker Mountain units. There were about 5 or 6 more yesterday, and I am out there not infrequently, and I know how many there are. Once there happened to be one antelope in my area to start with, now there are about 30 to 50 head....

Response: See Letter Response 4.3.

Comment 4: Phil Allen.

...Basically, after we have had a cold, long winter, up to March and April it becomes necessary to get them off so we can continue with our farming operations. As far as doing damage that you keep saying that we do on spring grazing, I can't see it. I have several different areas in the Escalante area, permits in the Escalante area, that I use all the time on spring grazing. Probably, the best of most of the time, the most period of use would be April 1st to June 1st. I have been off there now for 6 weeks, and I can take you back on those ranges and growth has continued on. We are high enough in elevation there is not much growth before the first of June, anyway, so everything that grows after the first of June is put in reserve and comes back to use for the next spring, and that's the way we prefer it up there, and I'm convinced that's the best way for the good of the range, too....

Response: The problem of reducing spring grazing on public land is a very real concern to livestock people because that is the time some of them need the range forage. Research work done by Dr. C. Wayne Cook regarding spring use shows that there is no question that in order to maintain some important forage species, that these plants can tolerate only about 25-percent utilization if they are to be grazed every year in the spring. The grazing period on each allotment will be selected from the alternatives in cooperation with each permittee and others involved at the time the allotment management plan is developed. The best solution for the plant growth, maintenance, and the livestock owner involved will also have to be developed.

Comment 5: Raymond S. Dawson, Utah Farm Bureau.

...If it takes another year of someone to stay there to give accurate information and adjust it so those men can be given an even break in their livelihoods. I'm sure you wouldn't want your job jeopardized on someone else's past work record. I don't think it is any more fair that these men's livelihoods be jeopardized on old, inadequate information....

Response: See Letter Response 22.10.

Comment 6: Lee Barton.

My question is, where do you arrive at the game figures that you have showing elk running all on the lower ranges on the West Mountain right directly west of Manti where there is absolutely no elk there? There never has been.

I'd like to indicate that they are not correct. I own considerable grounds there, and I have never seen elk out there in Antelope Valley. I don't think I have ever seen elk in Antelope Valley.

I don't think they should begin to use a base for elk herd there to run on private ground they have never been there. There is just no elk in that area.

Response: No elk should be planned for in the current situation in Antelope Valley. Elk now exist on the Uinta National Forest on the north end of the Sanpitch Mountains, and have been sighted on the Fayette Cattle Allotment; both are adjacent to Timber Canyon Allotment. However, Timber Canyon is within known elk winter range. No AUMs were requested by UDWR for Timber Canyon (present and future); however, UDWR did request elk AUMs on allotments on three sides of Timber Canyon. There is no present elk use in the Timber Canyon Allotment. An arbitrary 9 percent of the total allotment carrying capacity was provided for elk in the future. This was also done in other areas where the elk herds are expanding. It is a logical planning system assumption that they will expand to inhabit the mountain range south to Gunnison for winter range, including the Timber Canyon Allotment.

Comment 7: Neil Neilsen.

...This mountain of a book you have here is uncomprehensible for a person of my caliber. I don't see what advantage it is to even send it to me. It doesn't really make much sense for what we are actually here for....

Response: Refer to Letter Response 21.9.

Comment 8: Kay Frischknecht.

...I am a rancher in this area. I happen to run on five different BLM allotments. One thing that bothers me here is that all the alternatives that we have suggested, don't only suggest it, it leaves room for much larger wildlife allocation than what we have in some areas. I don't know the others, but I do know my own allotments. I have been on them since I have been a little kid, and I know these deer numbers don't exist there and never did.

Response: See Letter Response 4.3.

Comment 9: Mr. Barton.

...You can't maintain an elk herd of that size in those areas without putting them practically exclusively on private land....

Response: See Letter Response 13.2.

Comment 10: Kay Frischknecht.

...The point I would like to make is I don't think you have got enough acreage to revegetate, especially on allotments I am familiar with. The acreage that is planned for revegetation is pretty short compared to the acreage that is there that could be done.

Response: See Letter Response 13.6.

Comment 11: Francis Mortenson.

...Our fragile land out here in the west, like Utah, the rainfall, that won't do. You leave it idle for 50 years and a lot of it will not come back. I would like to suggest they have funds to reseed and improve areas, not wait for nature to do it.

Response: See Letter Response 13.6.

Comment 12: James Olsen.

...You had two boys from up in Washington cutting little grass, weighing one thing and another. I don't think this is anyway to judge a range. I don't think, if you want to judge a range right, look at our sheep in the fall of the year, look at them in the spring of the year, and see how they compare to the fall and the spring, then you can tell how to tell what a range is....

Response: There are two important components in managing rangelands. The first one is estimating production then stocking it to the estimated production capacity. The second is monitoring to evaluate how the stocking level is reflecting forage production and range condition.

Comment 13: David Madsen.

I am a little bit concerned on this range about having ponds, water for sheep or livestock. It seems like whenever we want ponds cleaned, all we get is red tape from the office or the BLM staff. It is not good, not worthwhile to manage it. With an allotment, the more water you have, the better it is, so you are not trailing your sheep, not having to haul water, and I think wherever there are seeps, where there can be a pond, you can dam it off, build a pond to hold water....

Response: Water is necessary for good range management and proper range use by livestock. This EIS proposes to develop water as shown in Summary Table 1, Page ix. The maintenance and operation of these ponds, wells, springs, and pipelines should be the responsibility of the range user. Recently, range developments have been delayed awaiting completion of grazing EISs and the attendant range development funds.

Comment 14: Kent Gregersen.

...I don't believe this draft EIS complies with the NRDC court order of 1975. One of the basic reasons I say this is that the court order was issued on livestock grazing versus non-livestock grazing on public lands....

Response: See Letter Response 21.1.

Comment 15: Kent Gregersen.

...Nowhere in the EIS have I found anything addressed concerning disease which is scattered on our rangeland by things like vibriosis, red water, red nose, bangs, shipping fever, so forth, scattered through the livestock. One of the best sources I know of to find out some data on this is Northern Montana. In 1968, their total white tail deer was wiped out with red nose. By 1973, they had built it back up and they were struck with red nose again and it took them out....

Response: See Letter Response 21.2.

Comment 16: Kent Gregersen.

...There was some data given on what an AUM that livestock brings in here, and I have some other information assembled by the Arizona State University and Texas Parks and Wildlife Department. They report that deer brought in a rate of \$88.65 cents per AUM versus cattle that brought \$25.44 cents per AUM. I think some of this data should be incorporated in the EIS and compared with other figures which were given us somewhere along the line. These figures should be pulled together so that we have not conflicting statements....

Response: See Letter Response 21.3.

Comment 17: Kent Gregersen.

...The EIS definitely indicates and states that there has been range deterioration. We have got to look at who is responsible for that deterioration so we don't perpetuate it. We should go into another type of a thing with new permittees. Now, you will take your tax dollars and dump thirty-six thousand new AUMs, donate them to sitting stockmen already using public land, he will turn around and sell it for the monetary value and why doesn't the taxpayer receive anything in return? I think there should be new method created here on increased rating AUM....

Response: See Letter Response 21.4.

Comment 18: Kent Gregersen.

...I think it should be really considered, and I think that the trespass law ought to be enforced. This causes range deterioration, which you are fighting. It is one of the tools, and we have had to fight the deterioration and haven't used it to its fullest extent. We see this all the time when we are out here in this back country....

Response: Refer to Letter Response 21.5.

Comment 19: Kent Gregersen.

...I think it is time that the public stood up and said no more fences. There is only one animal that is compatible with a fence and that is a domestic animal. All wildlife are endangered by fences. We compared a sheepman to a cattlemen, and a sheepman has to contain his herds where we have let the cattlemen run loose. I have seen cattle pile up on water holes for miles around, there is no distribution, and you can't gain distribution by fencing. You can gain concentration by fencing, but not distribution. So I think your fencing is working in the wrong way. We had an instance in Colorado where there was 900 deer killed in a 3 mile area on a fence....

Response: See Letter Response 21.6.

Comment 20: Kent Gregersen.

...The impact statement is real bulky, there are a lot of charts enclosed and, now, let's remember that this EIS is put out for public comment. The public or laymen, they are not professionals, a professional staff assembled this, and you understand the chart, but the general laymen don't. I think this ought to be condensed into a precise, concise, form in which--well, newspapers write, they claim, for the average absorption for a 12 year old....

Response: See Letter Response 21.9.

Comment 21: Kent Gregersen.

...I am talking about the complete area; what would, if it was utilized to its fullest extent, what would the cattle production be in this whole area?

Response: If it is assumed that cattle were the only animal and that they could use all of the forage inventoried, the Mountain Valley Planning Area could support 3,986 cattle for 1 year or 47,835 cattle for 1 month.

However, referring to Summary Table 1 Page ix, in Alternative to Optimize Livestock Production, cattle could use 9,899 AUMs on cattle allotments and sheep allotments could generally be converted to cattle allotments at a 50-percent exchange rate that would allow for 10,606 additional AUMs. In total, 20,505 AUMs or 1,708 cattle for 1 year could probably be grazed in the allotment without causing range deterioration.

TEXT REVISIONS

1. Page vii:

Add paragraph seven as follows: "During the review of comments on the draft EIS, most of the concern centered around permittee input to the planning and management, pertinence of the range survey and wildlife numbers, and the process to be followed in making management decisions. There were also comments which questioned the analysis. Riparian vegetation is of special interest, and opinions vary as to how it should be managed. The comments have helped by making word changes which improve the accuracy of the draft."

2. Page xii:

Third paragraph, third sentence: "Comments dealing.... is completed."

The sentence should read: "Comments dealing with the adequacy of the analysis and other relevant matter may be made during a 30-day period after the final environmental impact statement is completed. No decisions will be made until the completion of that period."

3. Page 1-8:

Table 1-2 under B. Long-Term Allocation, first three columns: "The long-term allocation would be:"

The introduction should read: "Allocate the following AUMs in the long term."

4. Page 2-10:

Figure 2-1 "Wildlife Allocation AUMs."

Figure should read: "Livestock Allocation AUMs."

5. Page 2-2:

Paragraph 2, following should be added: "...facilities and monitoring." "The intent of the McClure Amendment would generally be followed; however, should the District Manager determine that excessive damage could occur if delay in reducing the level of use were allowed, full force and effect reduction would be implemented."

6. Page 2-6:

Paragraph 6, following should be added: "...rangeland problems." "Off-stream water developments and stream access in water gaps would be designed to provide water for livestock and wildlife use when riparian areas are fenced."

7. Page 2-25:

Table 2-4, add the following restriction to Sagebrush Control by Spraying 2,4-D): "7. Should any quantity of 2,4-D be spilled, a dike would be built to contain the spill to prevent spread or entrance into drainage ways. Additionally, the Emergency Response Section of the EPA would be notified."

8. Page 2-28:

Line, "Change in Season of Use (No. of Operations): All of the columns should shift one column to the right.

9. Page 3-5:

Table 3-1 is revised as follows: (See following page.)

10. Page 3-13:

The first paragraph under Mule Deer, the second sentence: "The crucial range (acres on public lands) is Forest lands."

The sentence should read: "The crucial range on public lands is located mainly between agriculture private lands and steep-to-rolling hills of National Forest lands."

11. Page 3-22:

Third paragraph under "Fish", first sentence: The word great should be deleted from the name of northern pike. (Great northern pike do not occur in the planning area.)

12. Page 3-29:

First paragraph under "Attitudes and Lifestyles", first sentence: "Livestock operators ... in the planning area."

The sentence should read: "Individual livestock operators are the most intensive users in the planning area."

13. Page 3-29:

Second paragraph under "Attitudes and Lifestyles", first sentence: "The second most ... the planning area."

The sentence should read: "Another intensive user group in the area is recreationists (mostly hunters), both local residents and people from outside the planning area."

14. Page 3-29:

Fourth paragraph under "Attitudes and Lifestyles", third sentence: "As a whole ... environmental baselines."

TABLE 3-1

Threatened and Endangered Plants
in or Likely to Occur in the
Mountain Valley Planning Area

Plant Name	Former and Current Status
<u>Threatened</u>	
<u>Astragalus perianus</u>	F.R. 1975. F.R. 1976, endangered. Officially listed as threatened in F.R. on April 26, 1978. Recommended as threatened by Welsh.
<u>Sensitive Plants</u>	
<u>Astragalus desereticus</u>	F.R. 1975. "Possibly extinct." F.R. 1976, endangered. Recommended by Welsh as endangered in 1978.
<u>Astragalus montii</u>	Recommended by Welsh as endangered in 1978.
<u>Cycladenia humilis</u> var <u>jonesii</u>	F.R. 1975, endangered. F.R. 1976, endangered. Recommended as endangered by Welsh in 1978.
<u>Eriogonum ostlundii</u>	F.R. 1975, threatened. Recommended as threatened by Welsh in 1978.
<u>Mentzelia argillosa</u>	Recommended as threatened by S. L. Welsh in 1978.
<u>Najas flexilis</u> var. <u>caespitosa</u>	F.R. 1976, endangered. Recommended as threatened by Welsh in 1976.
<u>Penstemon waruii</u>	F.R. 1975, threatened. Recommended as threatened by Welsh in 1978.
<u>Phacelia utahensis</u>	F.R. 1975, threatened. Recommended as threatened by Welsh in 1975.
<u>Silene petersonii</u> var <u>peteronii</u>	F.R. 1975, threatened. Recommended as threatened by Welsh in 1978.
<u>Townsendia aprica</u>	F.R. 1975, endangered. F.R. 1976, endangered. Recommended as endangered by Welsh in 1978.

Source: Illustrated Manual of Proposed Endangered and Threatened Plants of Utah, S. L. Welsh, 1979.

The sentence should read: "Some environmental groups feel that public lands should be managed to the extent that they function as natural area environmental baselines."

15. Page 4-3:

Third paragraph, first sentence: "Impacts to ... not been documented."

The sentence should read: "Impacts to endangered or threatened and sensitive plant species in the planning area due to grazing have not been documented (see Table 3-1)."

16. Page 4-6:

The first paragraph under "Vegetation Modification," first sentence: "Past heavy grazing ... planning area."

The sentence should read: "The adverse impacts of past unregulated heavy grazing compounded by periods of drought, the introduction of highly competitive non-native weeds, and other factors have permanently modified presettlement vegetation."

17. Page 4-19:

Second paragraph under "Fish and Aquatic Animals", the first sentence: "Livestock and wildlife ... trampling of streambanks."

The sentence should read: "Cattle grazing of riparian habitat decreases or eliminates vegetation and causes trampling of streambanks."

18. Page 4-58:

No. 1 under Level of Use: "An initial ... of use."

The sentence should read: "1. An initial overall 5-percent increase above the licensed use or a 26-percent reduction from the preference level would be allocated for livestock use."

19. Page 4-101:

Third paragraph, first sentence: "Sagegrouse and Utah prairie ... available data."

The sentence should read: "Sagegrouse and Utah prairie dog populations could be expected to increase initially and decline over the long term; however, the amount is unquantifiable with available data."

20. Page 4-101 and 102:

The last part of a sentence on Page 4-101 and continued on Page 4-102: "In the long term ... grass conversion."

The sentence should read: "In the long term, big game, sagegrouse, and prairie dog populations could decrease, depending upon the extent of grass conversion."

21. Page R-3, Page R-13, Page R-36, Page R-43, and Page R-51:

AUMs Current Licensed Use and Current Vegetation Use (AUMs) for the Dry Wash Allotment should read 158 instead of 177.

22. Page R-108:

The No. "216" in the 1977 column for Dry Wash should be "90".

23. Page R-141:

Reference Crocker-Bedford, following should be added: "...Utah State University, Logan, Utah."

"Crocker-Bedford, Juan Spillett. 1978. "Habitat Relationships of Utah Prairie Dogs (Unpublished Report)."

"Crocker-Bedford. September 1978. Personal Communication with BLM Staff, Richfield, District."

"_____"; May 1979. Personal Communication with BLM Staff, Richfield District."

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